

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

-----)	
MARC VEASEY, JANE HAMILTON,)	
SERGIO DELEON, FLOYD J.)	
CARRIER, ANNA BURNS, MICHAEL)	
MONTEZ, PENNY POPE, OSCAR)	
ORTIZ, KOBY OZIAS, JOHN)	
MELLOR-CRUMLEY, PEGGY)	
HERMAN, EVELYN BRICKNER,)	
GORDON BENJAMIN, KEN GANDY,)	
LEAGUE OF UNITED LATIN)	CIVIL ACTION NO.
AMERICAN CITIZENS (LULAC),)	2:13-CV-193 (NGR)
AND DALLAS COUNTY, TEXAS)	[Lead case]
Plaintiffs)	
)	
VS.)	
)	
RICK PERRY, Governor of)	
Texas; and JOHN STEEN, Texas)	
Secretary of State,)	
Defendants)	
-----)	
UNITED STATES OF AMERICA,)	
Plaintiffs)	
)	
TEXAS LEAGUE OF YOUNG VOTERS)	
EDUCATION FUND, IMANI CLARK,)	
AND MICHELLE BESSIAKE,)	
Plaintiff-Intervenors)	
)	
TEXAS ASSOCIATION OF)	
HISPANIC COUNTY JUDGES AND)	
COUNTY COMMISSIONERS; and)	
HIDALGO COUNTY,)	
Plaintiff-Intervenors)	CIVIL ACTION NO.
)	2:13-CV-263 (NGR)
VS.)	[Consolidated case]
)	
STATE OF TEXAS, JOHN STEEN,)	
in his official capacity as)	
Texas Secretary of State;)	
and STEVE McCRAW, in his)	
official capacity as)	
Director of the Texas)	
Department of Public Safety,)	
Defendants.)	
-----)	

<p>2</p> <p>1 -----) 2 TEXAS STATE CONFERENCE OF) 3 NAACP BRANCHES; and the) 4 MEXICAN AMERICAN LEGISLATIVE) 5 CAUCUS OF THE TEXAS HOUSE OF) 6 REPRESENTATIVES,) 7 Plaintiffs) CIVIL ACTION NO. 8) 2:13-CV-291 (NGR) 9 VS.) [Consolidated case] 10) 11 JOHN STEEN, in his official) 12 capacity as Secretary of) 13 State of Texas; and STEVE) 14 McCRAW, in his official) 15 capacity as Director of the) 16 Texas Department of Public) 17 Safety,) 18 Defendants) 19 -----) 20 BELINDA ORTIZ, LENARD) 21 TAYLOR, EULALIO MENDEZ JR.,) 22 LIONEL ESTRADA; ESTELA) 23 GARCIA ESPINOSA, LYDIA LARA,) 24 MARGARITO MARTINEZ LARA,) 25 MAXIMINA MARTINEZ LARA, AND) LA UNION DEL PUEBLO ENTERO,) CIVIL ACTION NO. INC.,) 2:13-CV-348 (NGR) Plaintiffs) [Consolidated case] VS.) STATE OF TEXAS, JOHN STEEN,) in his official capacity as) Texas Secretary of State;) and STEVE McCRAW, in his) official capacity as) Director of the Texas) Department of Public Safety,) Defendants.) -----) ***** ORAL DEPOSITION OF JUANITA VALDEZ-COX TAKEN ON JUNE 25, 2014 *****</p>	<p>4</p> <p>1 INDEX 2 3 PAGE 4 Appearances..... 3 5 JUANITA VALDEZ-COX 6 Examination by Mr. Whitley..... 6 7 8 9 10 EXHIBITS 11 NUMBER DESCRIPTION PAGE 12 1 -- Second Amended Notice to Take Oral 13 Deposition of La Union del Pueblo Entero.... 28 14 2 -- Plaintiff's First Amended Complaint..... 65 15 3 -- LUPE Website Page..... 84 16 4 -- Press Release..... 111 17 5 -- Twitter Feed Page..... 128 18 6 -- Texas Politics Voter ID Poll February 2011.. 130 19 7 -- Texas Politics Voter ID Poll October 2012... 135 20 8 -- 2011 Form 990 for La Union del Pueblo Entero 152 21 22 23 24 25</p>
<p>3</p> <p>1 ORAL DEPOSITION of JUANITA VALDEZ-COX, produced as a 2 witness at the instance of the Defendants, and duly 3 sworn, was taken in the above-styled and numbered cause 4 on the 25th day of June, 2014, from 9:41 a.m. to 2:09 5 p.m., before SYLVIA KERR, CSR, RPR, CRR in and for the 6 State of Texas, reported by machine shorthand, at the 7 offices of La Union del Pueblo Entero, Inc., 1601 U.S. 8 83 Business, San Juan, Hidalgo County, Texas, pursuant 9 to the Federal Rules of Civil Procedure and the 10 provisions attached hereto. 11 A P P E A R A N C E S 12 COUNSEL FOR THE PLAINTIFFS LA UNION DEL PUEBLO ENTERO, 13 INC.: 14 MS. MARINDA VAN DALEN 15 MS. PRISCILLA NORIEGA 16 Texas Rio Grande Legal Aid, Inc. 17 531 East St. Francis Street 18 Brownsville, Texas 78529-5354 19 (956) 982-5540 20 21 COUNSEL FOR THE PLAINTIFF UNITED STATES OF AMERICA: 22 MS. ANGELA MILLER (via telephone) 23 MR. RYAN KING (via telephone) 24 U.S. Department of Justice 25 950 Pennsylvania Avenue NW NWB #7266 Washington, D.C. 20530 (202) 305-4143 COUNSEL FOR THE DEFENDANTS STATE OF TEXAS, RICK PERRY, JOHN STEEN and STEVE McCRAW: MR. G. DAVID WHITLEY Assistant Deputy Attorney General P.O. Box 12548 Austin, Texas 78711 (512) 475-3281</p>	<p>5</p> <p>1 COURT REPORTER: At this time the 2 deposition of Juanita Valdez-Cox is being taken in Cause 3 No. 2:13-CV-291, styled Texas State Conference of NAACP 4 Branches versus John Steen, et al, commencing at 9:41 5 a.m. on Wednesday, the 25th day of June, 2014 at the 6 offices of LUPE located at 1601 U.S. Expressway 83 in 7 the city of San Juan, Texas. The court reporter is 8 Sylvia Kerr, affiliated with Integrity Reporting. Will 9 counsel please state their appearances for the record. 10 MR. WHITLEY: My name is David Whitley, 11 and I represent the Defendants in this litigation. And 12 if all the attorneys want to introduce themselves before 13 we get started. 14 MS. VAN DALEN: Marinda van Dalen, Texas 15 Rio Grande Legal Aid representing LUPE at this 16 deposition. Beside me is my colleague, Priscilla 17 Noriega. 18 MS. MILLER: And I'm Angela Miller from 19 the Department of Justice representing the United 20 States. 21 THE WITNESS: I was going to say that the 22 address is not an Expressway, but Business 83. 23 JUANITA VALDEZ-COX, 24 having been first duly sworn, testified as follows: 25</p>

<p style="text-align: right;">6</p> <p>1 EXAMINATION</p> <p>2 BY MR. WHITLEY:</p> <p>3 Q. Ms. Cox, will you please state your full name</p> <p>4 and spell it for the record, please.</p> <p>5 A. Juanita, J-u-a-n-i-t-a, Valdez, V-a-l-d-e-z,</p> <p>6 hyphenate Cox, C-o-x.</p> <p>7 Q. Thank you. And where do you reside?</p> <p>8 A. In Donna, Texas.</p> <p>9 Q. And are you represented by a lawyer today?</p> <p>10 A. Yes.</p> <p>11 Q. And who would that be?</p> <p>12 A. Marinda.</p> <p>13 Q. And she's sitting right next to you?</p> <p>14 A. Yes.</p> <p>15 Q. Have you ever been deposed before?</p> <p>16 A. Yes, once.</p> <p>17 Q. In what case was that?</p> <p>18 A. It was, I think, redistricting and voter ID.</p> <p>19 Q. So two times previously?</p> <p>20 A. No, no, it was combined.</p> <p>21 Q. It was one case?</p> <p>22 A. It was one case.</p> <p>23 Q. Do you remember which one -- those were</p> <p>24 separate cases, so do you remember if it was in the</p> <p>25 voter ID or redistricting?</p>	<p style="text-align: right;">8</p> <p>1 A. I will.</p> <p>2 Q. Thank you. If you need a break, let me know.</p> <p>3 If we do take a break, I would ask that if I have</p> <p>4 already asked you a question, that we go ahead and have</p> <p>5 you answer that question before we take a break. But</p> <p>6 just let me know if anybody needs to take a break. I'm</p> <p>7 cool with taking breaks.</p> <p>8 A. Okay.</p> <p>9 Q. It's my understanding that you have a previous</p> <p>10 engagement that you need to get to?</p> <p>11 A. I do.</p> <p>12 Q. This afternoon?</p> <p>13 A. Yes.</p> <p>14 Q. And that's -- you need to be done with this by</p> <p>15 2:30; is that correct?</p> <p>16 A. Correct, yes. But earlier is good, too.</p> <p>17 Q. Understood. The lawyers attending and on the</p> <p>18 phone may object to any question that I ask, but you</p> <p>19 must still answer unless your lawyer instructs you not</p> <p>20 to answer.</p> <p>21 A. Okay.</p> <p>22 Q. Do you understand that?</p> <p>23 A. Uh-huh, yes.</p> <p>24 Q. Do you understand that you're under oath?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">7</p> <p>1 A. Well, maybe it was just a -- yeah. Maybe -- I</p> <p>2 just remember something about the redistricting because</p> <p>3 it was a question that was asked, but a lot of it -- the</p> <p>4 majority of the questions were on the voter ID.</p> <p>5 Q. Okay. I believe it was in the voter ID case.</p> <p>6 MS. VAN DALEN: Yes.</p> <p>7 Q. (By Mr. Whitley) And I'll represent to you</p> <p>8 that it was.</p> <p>9 A. Okay. Voter ID.</p> <p>10 Q. So let's just lay out some general ground rules</p> <p>11 so we're on the same page. We prefer verbal answers for</p> <p>12 the record. So I usually like to nod my head and stuff</p> <p>13 and I have to make a conscious effort not to do that.</p> <p>14 So yeses and no's, not uh-huhs or nuh-huhs because that</p> <p>15 doesn't show up in the record.</p> <p>16 A. Okay.</p> <p>17 Q. I'm going to try to avoid talking over you if</p> <p>18 you're answering a question. When I'm asking a</p> <p>19 question, even if you know the answer before I stop,</p> <p>20 will you just wait until I'm finished so we can have a</p> <p>21 clear record so we can avoid talking over each other?</p> <p>22 If you don't understand a question at all in</p> <p>23 any way, just stop me and let me know and I'll try to</p> <p>24 rephrase it or ask it in a way that's easier to</p> <p>25 understand or try to clarify something.</p>	<p style="text-align: right;">9</p> <p>1 Q. Do you understand that being under oath means</p> <p>2 that you have sworn to tell the truth?</p> <p>3 A. Yes.</p> <p>4 Q. And even though this is an informal setting,</p> <p>5 your answers have the same force as if you were</p> <p>6 testifying in open court before a judge. Do you</p> <p>7 understand?</p> <p>8 A. I understand, yes.</p> <p>9 Q. And are you prepared to answer my questions</p> <p>10 truthfully and completely?</p> <p>11 A. Yes.</p> <p>12 Q. Are you suffering from any illness that will</p> <p>13 affect your ability to provide accurate answers to my</p> <p>14 questions?</p> <p>15 A. Thank God, no.</p> <p>16 Q. Are you on any medication or take any</p> <p>17 medication routinely that will affect your ability to</p> <p>18 answer my questions truthfully and completely today?</p> <p>19 A. No.</p> <p>20 Q. Are you aware of anything else that might</p> <p>21 prevent you from accurately answering my questions</p> <p>22 today?</p> <p>23 A. No.</p> <p>24 Q. And when we're -- you're a designee of LUPE --</p> <p>25 A. Correct.</p>

10

1 Q. -- and unless otherwise indicated by me that
2 I'm asking you a personal question, when I say "you," I
3 will be referring to the group LUPE. And I may
4 differentiate between saying "you" referring to LUPE or
5 "you" personally. But generally you can interpret it to
6 mean the group LUPE.

7 A. Okay.

8 Q. And what did you do to prepare for your
9 deposition today?

10 A. I talked to my attorney, our attorney. And I
11 tried last night to look at the lawsuit, but I didn't.
12 I didn't get -- it's too much. And I probably wouldn't
13 have understood very much of it. And so I didn't read
14 it. It's about that thick, and so I just gave up on it.

15 Q. Which attorney did you prepare with?

16 A. Marinda.

17 Q. Okay. And did you talk to anyone else in
18 connection with preparing for your deposition today?

19 A. No.

20 Q. When did you guys talk? Was that yesterday,
21 you and Marinda?

22 A. It was yesterday and then it was just some --
23 you know, in e-mails early on.

24 Q. Earlier than yesterday?

25 A. Yes, uh-huh.

12

1 Q. Okay. Was there anything else that you can
2 remember, any other documents you remember reviewing?

3 A. No, that was it.

4 MR. WHITLEY: And just real quickly, on
5 the voter ID flyer, do you know if that's been produced
6 yet?

7 MS. VAN DALEN: Yes.

8 MR. WHITLEY: It has?

9 Q. (By Mr. Whitley) Did you meet with any other
10 attorney to prepare for your deposition?

11 A. No.

12 Q. And apart from what we've already discussed,
13 did you do anything else whatsoever to prepare for the
14 deposition?

15 A. Last night I looked at the -- at the -- not the
16 actual lawsuit because it was a lot. But I looked at
17 the questions, you know, that you might ask, but they
18 were the -- I stopped after a while because you asked
19 the same thing over and over again, and so it seemed to
20 me it was like the same thing, so I gave up on that.

21 Q. Anything besides that list of questions?

22 A. No. I don't have time. I didn't have any
23 time. We don't get out until 6:00 and my mom is 93
24 years old and she lives with us and just too busy. I
25 didn't get to any of that.

11

1 Q. Did you guys meet here? Or where did you-all
2 meet when you-all spoke in person? Or was it over the
3 phone?

4 A. Here.

5 Q. It was here?

6 A. Uh-huh.

7 Q. How long was the meeting?

8 A. Maybe an hour, hour and a half. Probably it
9 was about an hour, hour and a half.

10 Q. Was anyone else present?

11 A. No.

12 Q. Did you review any documents yesterday?

13 A. Did I review any documents? Yes, we did.

14 Q. Which ones were those?

15 A. A flyer. A flyer that we had used to inform
16 about the voter ID. We -- what else did we talk about?

17 MS. VAN DALEN: I'm going to tell you not
18 to discuss anything we talked about, just any documents
19 that you looked at in preparing for the deposition.

20 A. Okay. The flyer, a press release that we had
21 sent out about -- what else? The flyer, the press
22 release, the lawsuit. You know, she showed that to me.
23 And the -- I think something -- it was like the
24 responses that they -- that apparently you sent some
25 questions and they responded to you.

13

1 Q. Understood.

2 A. Yeah.

3 Q. Ms. Cox, what is your educational background?

4 A. I went to school here in Donna and I am --

5 Q. Was that high school?

6 A. To the tenth grade because I am a former
7 migrant farm worker. So then I went back and got my
8 G.E.D. and then I went back and got my associate degree
9 at the local university.

10 Q. What university is that?

11 A. Here at UTPA, Pan American.

12 Q. And aside from your associate's degree, do you
13 have any other professional qualifications, any kind of
14 certifications at all other than your degree?

15 A. No, not certifications or anything. I can -- I
16 can teach people how to harvest a lot of different crops
17 because that's what we did, but there's no certification
18 for that.

19 Q. Understood. Are you currently employed?

20 A. Yes.

21 Q. Where?

22 A. Here at this organization, La Union del Pueblo
23 Entero.

24 Q. And that's LUPE?

25 A. Yes, uh-huh.

14

1 Q. Are you employed by anyone else?
 2 A. No.
 3 Q. Do you receive income from any other source?
 4 A. Nuh-huh. No, this is it.
 5 Q. What is your role at LUPE?
 6 A. I am the executive director of this
 7 organization.
 8 Q. How long have you held that position?
 9 A. As executive director, since 2000 and -- I
 10 believe it's 2003, if I recall correctly. Yeah.
 11 Q. And, again, that is a paid position --
 12 A. Yes.
 13 Q. -- as executive director?
 14 A. Yes, uh-huh.
 15 Q. What are your official duties and
 16 responsibilities?
 17 A. There's a lot of different ones. We have -- we
 18 have a staff of, I think, 25 or 26. And we have to -- I
 19 have to be in charge of, you know, the different
 20 programs that we offer here at LUPE, make sure that our
 21 yearly operational goals are met by the -- by the staff
 22 and the services that we provide. It's making sure that
 23 the funding we get goes to the growth of the
 24 organization, which is really important to growing the
 25 base. This is an organization where people pay a fee to

16

1 A. Of course. With all that we have to do, it's a
 2 lot more. It's a lot more. And then sometimes it
 3 includes like weekends, right, but that's -- that's just
 4 part of the -- part of the work that we do.
 5 Q. Is all of the work that you do for LUPE done
 6 here at this building? Or do you work --
 7 A. We have other offices, so it may be here or I
 8 may travel to one of the other offices that we have.
 9 Q. How many other offices are there?
 10 A. Besides this one, there's four more.
 11 Q. All in Texas?
 12 A. All in Texas, all in this county for now,
 13 uh-huh.
 14 Q. Do you -- and forgive me, I may have already
 15 asked this question. Do you have a commute to and from
 16 the office at all?
 17 A. Do I have what?
 18 Q. How long does it take you to get to the office?
 19 A. Oh, not long at all. We live in Donna and
 20 it's, I would say, maybe ten -- today it takes a little
 21 bit longer because on Wednesdays there's a flea market
 22 and there's a whole lot of, you know, cars and people
 23 going to the flea market and I drive right through
 24 there, so only Wednesdays are a little longer. Other
 25 than that, actually it's not far at all. It's very,

15

1 belong and pay for their services. And so need to make
 2 sure that that funding is used in the best way possible
 3 to continue with the programs.
 4 Servicing the needs of the community. And that
 5 is -- that is really, really an important goal that we
 6 have. Also, the -- making sure that those members that
 7 live in the colonias, they're low income areas are out
 8 in the community that have certain needs, that realize
 9 that they also have the power to make change in those
 10 needs, that they can, you know, work together. And if
 11 it's a lack of street lights in the colonia or lack of
 12 water or whatever services or needs that they have that
 13 they can address them, that through our community
 14 organizing, training, leadership development that we can
 15 all -- that it is our responsibility.
 16 At the end of the day we are the ones that have
 17 to live if we don't have water or street lights or
 18 things like that. And so that's one of the -- one of
 19 our main -- my main goals here that I have to keep an
 20 eye on, that that is always being achieved.
 21 Q. How many hours a week do you spend working at
 22 LUPE?
 23 A. Well, my weekly hours are -- well, it should be
 24 40, but it's never 40.
 25 Q. Is it usually more?

17

1 very convenient, very close.
 2 Q. Did you have any previous jobs before you
 3 started here at LUPE?
 4 A. Oh, yes, uh-huh.
 5 Q. What were those?
 6 A. How far do you want to go?
 7 Q. We can start with the ones that you remember
 8 right before you started with LUPE and then I can tell
 9 you to stop.
 10 A. I was -- first I was a Head Start director here
 11 in this county also. And then I was --
 12 Q. When was that?
 13 A. I have no idea. Many years ago. Maybe -- I
 14 don't have -- it was a long time ago. And then -- and
 15 then I volunteered here at the union in around -- around
 16 the mid '80s.
 17 Q. When you say "the union," do you mean LUPE?
 18 A. No. I mean, the United Farm Workers.
 19 Q. Okay.
 20 A. LUPE wasn't until 2003. That's when we brought
 21 LUPE to Texas. So before then, we were the United Farm
 22 Workers. And I started as a social service provider
 23 offering services up front to the members. And then I
 24 became a community organizer for the union, and then I
 25 became the coordinator for the different programs, and

18

1 then I became the executive director.
 2 Q. So when you started with LUPE, it was in a
 3 volunteer capacity?
 4 A. For many years. With the United Farm Workers,
 5 that's how it was. Everybody was volunteering. And I
 6 volunteered. Well, they would give us \$25 a week for
 7 childcare, but everybody was volunteering. That's how
 8 we were for, oh, I would say a good maybe ten or 12
 9 years.
 10 Q. And then did LUPE start in 2003?
 11 A. Yes.
 12 Q. And that's --
 13 A. No. In Texas it did.
 14 Q. Okay.
 15 A. Yeah.
 16 Q. And then that's when you became the executive
 17 director?
 18 A. The director and then executive director,
 19 uh-huh.
 20 Q. How long were you director before you became an
 21 executive director?
 22 A. I think it was -- it wasn't too long. Maybe
 23 three or four years and then --
 24 Q. How are those positions different?
 25 A. As just director, I was in charge of this

20

1 A. They're elected by the membership of the
 2 organization.
 3 Q. To serve on the advisory board?
 4 A. To be on the advisory board. And then from the
 5 advisory board, after they serve a few years, then they
 6 can move up to the executive board.
 7 Q. How are the members of the executive board
 8 chosen?
 9 A. Elected.
 10 Q. From the -- by the members of LUPE?
 11 A. No, by the board members. By the -- they're
 12 recommended and then they're chosen by the board
 13 themselves. You know, the other board members.
 14 Q. So the executive board votes as to whether or
 15 not they want somebody on their executive board?
 16 A. Right. For example, from the advisory board,
 17 if a member has been on the advisory board, let's say,
 18 two years and then I will write up a bio on that person
 19 and I will recommend that to the executive board and
 20 then they vote whether to vote that person -- to have
 21 that person on the board.
 22 Q. Does that occur when there's an open spot on
 23 the executive board? Or does it grow continuously?
 24 A. It has to -- we have to name one community
 25 member to the executive board every year.

19

1 office here -- of this office here and then we had
 2 people based in the different offices like just office
 3 managers. And then our board just decided that that
 4 wasn't working out too well, so we wanted to put
 5 everything under one, which was me, you know, as
 6 executive director.
 7 Q. So this is the main office for all of the other
 8 locations in South Texas?
 9 A. Oh, yes, this is like the oldest office, yeah,
 10 uh-huh. This has been here the longest.
 11 Q. Who do you report to?
 12 A. We have an advisory board of LUPE members and
 13 then obviously the executive board.
 14 Q. What is the difference between the advisory
 15 board of LUPE members and the executive board?
 16 A. Well, the advisory board advises on certain
 17 questions, you know, that I may have, certain programs.
 18 And obviously the executive board, well, they make
 19 policy and the policies and approve the yearly
 20 operational plan, you know, approve our budget. That's
 21 the business of the executive board.
 22 Q. Who makes up the advisory board? You mentioned
 23 LUPE members.
 24 A. Yes, it's LUPE members.
 25 Q. Are they elected to serve? Do they --

21

1 Q. Is that according to your bylaws?
 2 A. Yes, uh-huh.
 3 Q. And how many executive board members are there
 4 now?
 5 A. There's seven. It was five and now there's
 6 seven.
 7 Q. So every year that will grow to eight and
 8 then --
 9 A. Yeah, but we have a limit. I think it's -- I'm
 10 not exactly sure, but I think it's going to be like 11
 11 and then that will -- then that will be it.
 12 Q. So once it gets to 11, when number 12 is ready,
 13 somebody has to fall off?
 14 A. Yeah. Yeah, because that's the limit that's on
 15 the -- I don't remember if it's nine or 11 that's on the
 16 bylaws of the members that we need to have on the
 17 executive board.
 18 Q. So do you prepare the budget and then present
 19 it to the executive committee -- or the executive board?
 20 I'm sorry.
 21 A. Yeah. I don't prepare it by myself, but I am
 22 the final authorization on it. And I present it to the
 23 executive board.
 24 Q. But who do you manage around here that would
 25 help you put that together?

22

1 A. We have our grant writer and then we have our
 2 financial -- what do they call her? She's like in
 3 accounting to see the financial CFO, who we contract
 4 with, that works with us on our books. And then we have
 5 an accounts payable person. And then we have a person
 6 that works under the CFO.
 7 So we have three people that help me with the
 8 budget and then plus the grant writer. And then plus
 9 the office managers in each of the offices, they just --
 10 they will give me their operational budget with goals,
 11 with a budget. But that's all they do. They just turn
 12 it in. The rest is up to the CFO, the assistant and the
 13 accounts payable person and the grants writer and then
 14 in the end, myself.
 15 Q. And out of the assistant, the CFO --
 16 A. Right.
 17 Q. -- the grants writer and the accounts payable
 18 person --
 19 A. Yes.
 20 Q. -- how many of those are in-house and how many
 21 do you hire outside of LUPE?
 22 A. One is in-house and three are outside.
 23 Q. Which one is in-house? The CFO?
 24 A. The grants writer.
 25 Q. The grants writer is in-house?

23

1 A. Right, uh-huh. He's the grants writer and the
 2 budget person for LUPE locally.
 3 Q. Okay.
 4 A. Not the grants -- the grants and the budget
 5 person.
 6 Q. What makes up the biggest chunk of your budget?
 7 A. What do you mean? I don't understand.
 8 Q. Is your budget calculated yearly?
 9 A. Yes.
 10 Q. Every year do you come up with a new budget?
 11 A. Yes.
 12 Q. And the executive board votes on it?
 13 A. Exactly.
 14 Q. And approves it or --
 15 A. Right.
 16 Q. Maybe if they have changes, you guys will
 17 change something?
 18 A. They will. Right, they will make changes,
 19 uh-huh.
 20 Q. When you present that budget, what line item
 21 costs the most money as you're estimating what you're
 22 going to spend money on?
 23 A. Salaries.
 24 Q. Salaries?
 25 A. Uh-huh.

24

1 Q. Do you know about what percentage?
 2 A. No, I don't.
 3 Q. What --
 4 A. But it is the biggest chunk.
 5 Q. What other items make up a big chunk of that
 6 budget?
 7 A. Probably benefits. We have really excellent
 8 benefits for the staff. And then -- I think that's the
 9 next one.
 10 Q. And how much of a chunk does LUPE's programming
 11 and voter outreach make up of the budget?
 12 A. Well, that falls under organizing, and we have
 13 a budget for our community organizers that are the
 14 people that work out in the communities. I don't know
 15 how much of it is for that. But we have the social
 16 services and the organizing. So between those two, it's
 17 a big chunk of our budget.
 18 Q. How many organizers do you guys have?
 19 A. We have -- we have -- I think it's four and one
 20 coordinator, so five total.
 21 Q. Are they paid?
 22 A. Oh, yes, uh-huh.
 23 Q. Are they salaried employees of LUPE?
 24 A. Uh-huh, yes.
 25 Q. And how many people do you have on the social

25

1 services team?
 2 A. Oh, that's a lot because we have -- we have
 3 three or four in each office. And here we have maybe
 4 five or six. I can't -- I don't --
 5 Q. Would it be fair to say somewhere between 15
 6 and 20?
 7 A. Yes, uh-huh. Well, maybe -- maybe 12 to 15,
 8 yeah.
 9 Q. Okay.
 10 A. Because we have other staff also.
 11 Q. So the organizers and those that help out with
 12 social services are who performs the voter outreach for
 13 LUPE?
 14 A. The social service providers and the
 15 organizers, yes.
 16 Q. Is there any overlap between those two groups?
 17 Is there anybody --
 18 A. I have no idea. I don't know how I could tell
 19 that.
 20 Q. I guess what I'm asking is: Is anybody who is
 21 an organizer and gets paid by LUPE --
 22 A. Right.
 23 Q. -- also on the social services team?
 24 A. Oh, no, nuh-huh, no.
 25 Q. What other activities do the organizers perform

26

1 other than voter outreach?

2 A. Well, that's included in their -- in their
3 community organizing, which is -- includes -- the voter
4 outreach includes the -- you know, the GOTV, the
5 different events with potential candidates that are
6 running for office, you know, like candidates forms.
7 They have media events to announce to the community
8 what's coming down that might have an impact on the
9 community.

10 They have -- they organize marches, you know,
11 different kinds of protests that need to happen against,
12 you know, different issues that we're working on. They
13 have a lot of meetings with what we call house meetings,
14 which are small meetings in the communities in a home of
15 a family that wants to discuss certain issues. And, of
16 course, a really important job is also the enrollment of
17 members into the organization.

18 Q. What sort of events do the organizers announce
19 to the community?

20 A. For example, the whole issue on health, you
21 know, that was coming down and then Governor Perry
22 denied the Medicaid, so they tell folks how that might
23 have an impact on them. When the immigration reform,
24 you know, that we're still working on, that hasn't
25 happened. They educate them on that. You know, tell

28

1 at the church, they might take a service provider with
2 them to explain that, too. The service providers are
3 very skilled at the issues like of immigration and
4 income tax and they support the organizers in their work
5 and vice versa, the organizers with service.

6 Q. Explain to me what LUPE does for its members
7 regarding income tax. You mentioned that earlier.

8 A. Oh, we -- for many years LUPE has offered the
9 service of income tax to its membership at lower cost
10 than at others because they're members of the
11 organization. And we fill out the income tax papers,
12 you know, your tax returns, the tax returns for our
13 membership.

14 MS. VAN DALEN: Can we go off the record.

15 (A recess was taken.)

16 (Exhibit No. 1 was marked.)

17 Q. (By Mr. Whitley) You've been handed what's
18 been marked as Exhibit 1. And do you recognize that
19 document?

20 A. Yes, uh-huh.

21 Q. Can you tell me what it is, for the record,
22 please?

23 A. This is -- I think that this is our -- this is
24 part of the -- you know, the filing of the lawsuit. It
25 looks like it's -- it says Oral Deposition of La Union

27

1 them about, you know, how they can have an impact or how
2 they can get involved in that issue. Right now we're
3 working on the street lights. That's a huge issue.

4 So we have federal issues that we work on, we
5 have state issues, and we have very local issues also
6 that they work on. So they're involved in all of those
7 three areas.

8 Q. And how is what the organizers do different
9 than what the social services people do?

10 A. The social services, they are not out in the
11 community unless an organizer invites them to go present
12 information on the work that they do. For example, LUPE
13 also does -- teaches English, ESL, and it also teaches
14 the history and the government of the United States to
15 the people in the community that want to become
16 citizens.

17 And so if an organizer is going to go to a
18 community and the organizer doesn't know all the details
19 about that program, then a service provider will
20 accompany the organizer so that the social service
21 provider can explain the details of that program. So
22 they do sometimes go together. Or on Sundays if the
23 organizer is going to talk at a church about the issues
24 of the community, whether it's the impact on the voter
25 ID or the healthcare, any of those, if they go explain

29

1 del Pueblo Entero. This is a notice for this
2 deposition.

3 Q. It's the topics that we noticed for this
4 deposition.

5 A. Oh, yeah.

6 Q. So the title on there is --

7 A. Oh, that's right.

8 Q. -- Defendant's Second Amended Notice of
9 Intention To Take Oral Deposition --

10 A. Yes.

11 Q. -- of LUPE.

12 A. Yes.

13 Q. Have you seen this document before?

14 A. You know, briefly. I think that this is --
15 yeah, this is the one that I looked at for a little
16 while.

17 Q. When did you last review it?

18 A. I'm trying to figure out if this is the one
19 where it was repeating the questions.

20 MS. VAN DALEN: They all do that.

21 A. Well, I looked at one last night that kept
22 saying that. I think it is, but -- I think it is.

23 Yeah, this is the one that I -- I looked at this last
24 night briefly.

25 Q. And if you would turn to page 5 where it says

<p>30</p> <p>1 "matters." 2 A. Yes. 3 Q. And if you would, read for me topic number one 4 right there. 5 A. Where it says "the factual basis"? 6 Q. Yes, ma'am. 7 A. "The factual basis of your claim or defense in 8 this lawsuit, including any contention that SB 14 as 9 enacted by the State of Texas 82nd legislature was 10 enacted with a discriminatory purpose and intent; and 11 two, results of denying and abridging the right to vote 12 on account of race and language, minority status." 13 That's it. 14 Q. And have you been -- 15 A. Yes. 16 Q. Have you been designated to testify as to topic 17 number 1 by LUPE? 18 A. Yes. 19 Q. Are you prepared to testify -- 20 A. Yes. 21 Q. -- about topic number 1? Moving on to topic 2, 22 can you read that for me? 23 A. "Any" -- this one, "any interest"? 24 Q. Yes, ma'am. 25 A. "Any interest you have in the above captioned</p>	<p>32</p> <p>1 the witness answers, I'm going to say that we have 2 objected to all of the questions relating to membership. 3 LUPE is not alleging standing in this litigation based 4 on harm to its members. That was in our amended 5 complaint. As we stated in these objections, that's no 6 longer a claim and I'm willing to stipulate to that on 7 the record today. 8 MR. WHITLEY: And just to be clear, is it 9 the position of LUPE that none of their members are 10 harmed by SB 14? 11 MS. VAN DALEN: No, that's not the 12 position. 13 MR. WHITLEY: It's just based on standing? 14 MS. VAN DALEN: The standing of the 15 organization in the litigation is based upon harm to the 16 organization. 17 MR. WHITLEY: Okay. And remind me again, 18 did you guys object to all the rest of the topics from 19 here on out? 20 MS. VAN DALEN: I can give you a copy of 21 our objections. 22 MR. WHITLEY: You don't have to. I'm 23 going to go through each of them. 24 (Off the record.) 25 Q. (By Mr. Whitley) We're back on the record.</p>
<p>31</p> <p>1 litigation that is not adequately represented by the 2 Plaintiff, United States of America." 3 Q. Have you been designated to testify to topic 2 4 on behalf of LUPE? 5 MS. VAN DALEN: And I'm going to state for 6 the record that we've made an objection to that topic. 7 A. Can you explain what that means? 8 Q. Sure. We served this notice of deposition on 9 LUPE as an organization. 10 A. Right. 11 Q. LUPE designated you to testify. 12 A. Yes. 13 Q. And I need to make sure that -- obviously 14 subject to the objections served by your attorney -- 15 that you're prepared to testify to all of these topics. 16 A. Yes. 17 Q. So number 2 is you're prepared to testify to 18 topic 2? 19 A. Yes. 20 Q. And then number 3, will you read that one to 21 me? 22 A. "The identity of your members on November 7, 23 2013." 24 Q. Have you been designated to testify to topic 3? 25 MS. VAN DALEN: And I'm going to -- before</p>	<p>33</p> <p>1 And Ms. Cox, just to be clear, on Exhibit 1 from topics 2 1 through 29, if you look, there are 29 topics. 3 A. Okay. 4 Q. Will you confirm that? 5 A. Yes. 6 Q. And you've been designated by LUPE to testify 7 to all 29 topics, correct? 8 A. Yes. 9 Q. And subject to the objections served by your 10 attorney, you're prepared to testify to all 29 topics, 11 correct? 12 A. Yes. 13 Q. Have you talked to any of the other plaintiffs 14 in this lawsuit? 15 A. No. I don't -- I haven't even looked at who 16 they are, but I don't recognize them. No, I have not. 17 Q. Have you ever met any of the other plaintiffs 18 in this lawsuit? 19 A. These are the -- these are they -- these are 20 the people that you're referring to? 21 Q. Yes, ma'am. 22 A. No. 23 Q. Actually, you can look at the caption, the part 24 of the caption that includes LUPE. 25 MS. VAN DALEN: Yeah, if you could</p>

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1 clarify. Do you just mean the plaintiffs who are part
 2 of what we've been calling the Ortiz group?
 3 MR. WHITLEY: Yes.
 4 MS. VAN DALEN: Okay. Because . . .
 5 A. No, I don't know them.
 6 Q. And were you aware that one of the original
 7 plaintiffs in the Ortiz group, Roxanne Hernandez,
 8 withdrew from the lawsuit?
 9 A. Was what?
 10 Q. Withdrew. She dropped out of the lawsuit?
 11 A. Is she here?
 12 Q. She's not because that was served after she
 13 dropped out.
 14 A. Oh, no, I did not know. I don't know that. I
 15 don't know them. Was that announced? Or how would I
 16 know that?
 17 Q. You would have found out. If you knew the
 18 people, they would have told you or Marinda would have
 19 told you.
 20 A. Oh, no, I didn't know that.
 21 Q. Have you spoken to any attorneys at the
 22 Department of Justice about this lawsuit?
 23 A. No.
 24 Q. Have you written or recorded statements to
 25 reporters or anyone in the media about this lawsuit?

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1 Q. Events related to this lawsuit.
 2 A. Events related in the Internet? We may have.
 3 We have -- our communications director probably put
 4 something on Facebook or on our website. He may have.
 5 I'm not 100 percent sure.
 6 Q. Does the communications director report to you?
 7 A. Yes, he does.
 8 Q. Does he receive or seek your approval before
 9 submitting statements of LUPE on the Internet?
 10 A. Yes, he does, but I don't usually get on
 11 Facebook to see them, right.
 12 Q. So how does that usually work?
 13 A. He -- he sends them to me via e-mail, yeah.
 14 Q. And then once you approve it, he'll go ahead
 15 and post it?
 16 A. Then he'll just do his job, right.
 17 Q. Does LUPE have a Twitter account?
 18 A. Not -- I think we do. I'm not too -- you know,
 19 I think we do. I'm not 100 percent sure. I know
 20 Facebook he does and I know he sometimes does like what
 21 he calls like a blog and then our website.
 22 Q. Who's your communications director?
 23 A. John Michael Torres.
 24 Q. And do you know what his duties are other than
 25 posting information on you-all's website and his blog

35

1 A. About the lawsuit? I don't think so. We've
 2 talked about -- not the lawsuit, but the -- but the
 3 bill. But no, actually, I think -- I think in a press
 4 release we did say that LUPE was a plaintiff in the
 5 lawsuit. I think -- I think I remember that.
 6 Q. And when you say "the bill," you're referring
 7 to --
 8 A. SB 14.
 9 Q. The voter ID bill?
 10 A. Yes, the voter ID bill.
 11 Q. We'll refer to it as SB 14 on the record.
 12 A. Okay. Sure.
 13 Q. And we'll know what that means.
 14 A. Uh-huh.
 15 Q. Do you remember when that press release was
 16 issued?
 17 A. When that was issued?
 18 Q. Uh-huh.
 19 A. No, I don't remember the date. I don't
 20 remember the date on that, but I know that we did do a
 21 press release on it.
 22 Q. Have you posted -- or has LUPE posted any
 23 statements about the events related to this lawsuit on
 24 the Internet?
 25 A. Events leading to the --

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1 and Facebook and --
 2 A. Actually, he -- he reads a lot of the news that
 3 come out. And anything that has an impact on the LUPE
 4 membership or our community, he will -- he will write
 5 the press releases or he will write them and then I will
 6 approve them or not. And then he also helps with the
 7 leadership development of our memberships -- of our
 8 membership so that he does a lot of training with the
 9 members so that they can tell their own story and how
 10 certain issues are going to impact them.
 11 That's part of his work also. And then he also
 12 covers, you know, different meetings. Like yesterday he
 13 was at a meeting for the issue on the unaccompanied
 14 minors and then he'll write, you know, on that, too.
 15 Q. How much do you -- does LUPE rely on John
 16 Michael Torres, the communications director, to post its
 17 business or what it considers to be important on its
 18 website or Facebook or issue a press release? Is that
 19 every issue that comes up he will do that? Or how do
 20 you guys choose?
 21 A. Not every issue, but issues that have been
 22 identified by our membership that are important to them
 23 that will have a negative impact on them somehow, he
 24 does that.
 25 Q. How does the membership identify that to you?

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1 A. At the -- remember earlier I told you about the
2 house meetings that the organizers have?
3 Q. Yes.
4 A. That's where the issues are discussed and
5 prioritized and that's where the -- from that, we decide
6 what actions to take.
7 Q. So has there ever been an instance in which the
8 communications director posted something on the Internet
9 or Facebook or -- and I believe you mentioned there was
10 a Twitter account?
11 A. I said I thought there was. Not 100 percent
12 sure.
13 Q. Without your approval?
14 A. Nuh-huh, no. Nuh-huh. In all the years he's
15 been with us, I haven't found that to be the case, not
16 that I know of.
17 Q. Can you tell me what you understand this case
18 to be about?
19 A. The voter ID, the SB 14?
20 Q. Yes, ma'am.
21 A. My understanding of it is that the voter ID was
22 created or was passed to have -- that it has a negative
23 impact on the people that we work with, with the
24 community that we work with. That it -- that it placed
25 unneeded obstacles to people that already have -- that

40

1 Q. And I'm going to show you a tweet --
2 A. Okay.
3 Q. -- that the LUPE Twitter account sent out and I
4 want you to look at it. I'm going to hand you my phone
5 and see if you recognize this post.
6 A. Okay.
7 MS. VAN DALEN: Can I see it first?
8 MR. WHITLEY: Sure.
9 Q. (By Mr. Whitley) Can you see the date on
10 there, first of all?
11 A. 6/26. Actually, almost a year ago. '13.
12 6/26/13.
13 Q. And does that tweet look familiar?
14 A. Yes.
15 Q. You can read it into the record.
16 A. "Two hours after Supreme Court gets Voting
17 Rights Act, Texas AG suppresses minority votes."
18 Q. And is that --
19 A. "Voters." Excuse me.
20 Q. I'm sorry for interrupting you.
21 A. Voters. I don't -- you know, I don't get on
22 the Twitter, but it's something that we would have put
23 out.
24 Q. And would that have been put out by the
25 communications director?

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1 are living in very difficult situations. It just added
2 more difficulties to deny them the right to vote.
3 Q. And what do you understand this case to be
4 addressing?
5 A. That's what -- that's what it is. This case,
6 we're trying to put a stop to the denying of voters
7 rights to vote.
8 Q. And when did you learn that the voter ID law
9 had taken effect?
10 A. I don't recall the date when that was.
11 Maybe -- I don't recall. Two years ago or last year. I
12 don't remember the date. I just know it was passed in
13 the last legislative session and then I think --
14 MR. WHITLEY: We can go off the record.
15 (Off the record.)
16 Q. (By Mr. Whitley) We were discussing earlier
17 whether or not you remembered --
18 A. The date.
19 Q. -- when you learned that the voter ID law had
20 gone into effect?
21 A. Uh-huh.
22 Q. I am on Twitter on my phone.
23 A. Okay.
24 Q. And this is LUPE's Twitter account.
25 A. Oh, good.

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1 A. Yes, he does all that.
2 Q. And so it would be fair to say that you learned
3 about voter ID going into effect some time around when
4 this tweet got sent?
5 A. I couldn't say that. You know, I don't know.
6 I just know that it hit us hard and that we probably did
7 that, put out that tweet.
8 Q. Do you remember how you found out or who
9 informed you? Let's start with how you found out.
10 A. Probably the news. Probably the news.
11 Q. In the news?
12 A. Yeah.
13 Q. And have you continued to keep track of news
14 articles or news stories about voter ID?
15 A. As much as possible.
16 Q. Were you interested in whether or not voter ID
17 had taken effect in Texas?
18 A. Was I interested? Was I interested in -- we
19 didn't want it to, right.
20 Q. So yes or no?
21 A. We didn't want it to take effect.
22 Q. If you didn't want it to take effect --
23 A. Right.
24 Q. -- would that mean that you were interested in
25 whether or not it took effect?

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1 MS. VAN DALEN: I object if you're asking
2 for a legal conclusion.
3 A. Yes.
4 MR. WHITLEY: I'm not.
5 MS. VAN DALEN: She's trying to answer
6 you. She's already tried to answer your question.
7 MR. WHITLEY: Yeah.
8 Q. (By Mr. Whitley) So would it be fair to
9 characterize your testimony --
10 A. Oh, again? I thought we were done. Okay.
11 Q. I'm sorry for interrupting. Let me see if I
12 can rephrase it in a way that's easier to answer.
13 A. Okay. Okay.
14 Q. If by saying that you didn't want it to take
15 effect means that you weren't interested, would it be
16 fair to characterize your testimony that you were
17 interested in whether or not voter ID had taken effect?
18 A. We were interested. We were interested because
19 we didn't want it to take effect.
20 Q. Thanks. Now, personally, do you have a
21 driver's license?
22 A. Yes, uh-huh.
23 Q. And have you ever voted in the State of Texas?
24 A. Oh, yes, that's -- many times. That's a
25 very -- that's a very important privilege to me.

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1 Q. So how did you personally learn about this
2 case?
3 A. About the --
4 Q. The lawsuit, yes, ma'am.
5 A. The lawsuit? I think --
6 MS. VAN DALEN: And I'm going to direct
7 you not to discuss any communications you had with me or
8 any other attorneys with Legal Aid.
9 A. No, I saw it. It was in -- I think it was an
10 e-mail that I received or somehow I think it was the
11 NAACP or the -- not LULAC, but there's another one.
12 MALDEF or -- MALDEF, somebody, I heard that there was a
13 lawsuit.
14 Q. Do you remember who the e-mail came from?
15 A. No, I don't know if it was just -- I don't
16 remember if it was just an announcement about them
17 taking on this voter ID. Some kind of announcement, I
18 think, is how I found out. I think that that would be
19 the way that I would have found out that there was a
20 lawsuit.
21 Q. You're pretty sure you found out over e-mail?
22 A. Not 100 percent sure, but I think that --
23 usually that's how I get -- I find out, you know, news
24 of -- there's an on-line newspaper and that's usually
25 where I --

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1 Q. And also personally, have you voted since voter
2 ID went into effect?
3 A. Yeah. We just had elections, uh-huh. Yes, I
4 did.
5 Q. Do you remember which elections?
6 A. Just these ones that just passed in March.
7 Q. That would be the March primaries?
8 A. Yes, it would have, uh-huh.
9 Q. Did you vote in the run-off in May?
10 A. In the run-off in May? In the local elections?
11 Q. I'm not sure if there was a run-off locally.
12 A. There was only run-offs in local elections. I
13 don't remember run-offs in -- that I voted in others.
14 Q. Do you remember if you voted in the November
15 2013 constitutional amendment election?
16 A. Yes, I always vote, so --
17 Q. And you did vote in that election?
18 A. Yes.
19 Q. When did LUPE become a plaintiff in this case?
20 A. Maybe -- maybe four months ago.
21 Q. And how did LUPE become a plaintiff in this
22 case?
23 A. How did we become a plaintiff?
24 Q. Yes.
25 A. By filing the lawsuit.

45

1 Q. What on-line newspaper?
2 A. It's called the Rio Grande Guardian.
3 Q. Is there a print copy of that as well?
4 A. Not that I know of.
5 Q. They're just an on-line publication?
6 A. Yes, uh-huh, they're just an on-line
7 publication.
8 Q. Would you say that that's where you get most of
9 your news?
10 A. Well, that's the local newspaper, but it covers
11 national, state and local issues. But then, of course,
12 there's the others, you know, the New York Times or the
13 LA or the Huntington Post. I mean, you know, we read
14 just different ones, yeah.
15 Q. Sure. Do you read all of those on a regular
16 basis?
17 A. Oh, yes. I'm a -- yeah.
18 Q. How much of a --
19 A. I'm -- yeah, I have that habit now of reading
20 them.
21 Q. How much in a normal day would you spend
22 catching up on news on any of those publications?
23 A. Probably my first hour, hour and a half of the
24 morning.
25 Q. Did somebody approach you about this case?

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1 A. No. We approached -- when it's an issue that
 2 impacts our community, I try to find, you know,
 3 attorneys that can help us file a lawsuit. If I -- if
 4 the membership is hurting and is discussing something
 5 that's going to have a negative impact, that's part of
 6 my job, to find somebody that can help us with that.
 7 Q. How did LUPE, as an organization, decide that
 8 it wanted to get involved in this lawsuit?
 9 A. Well, we decided, again, because of the -- you
 10 know, the meetings that the community organizers have.
 11 You know, the GOTV vote that we do when we're knocking
 12 on doors and you listen to what the issues are. The
 13 services -- the service providers, when we have people
 14 that come in for services, if it's an issue that they're
 15 discussing, right?
 16 And I talk to the organizers, to the
 17 coordinator and I say, look, this is what we're hearing
 18 out in the -- this is what I'm getting that's going on
 19 out in the community, is this something? And then
 20 they'll say, yeah, you know, all the organizers, or say,
 21 no, it was only in this area or -- you know, and that's
 22 how we -- and then -- and then we look at is it going to
 23 have an impact on the membership.
 24 And if it is, then we say, you know what, we
 25 need to file a lawsuit, but also we need to do training,

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1 housing, some are health, others are immigration, others
 2 are education, you know, wage. There's different kinds
 3 of non-profits that deal with different issues and their
 4 executive directors belong to this organization.
 5 Q. And you mentioned earlier that you made the
 6 decision to get involved?
 7 A. Yes.
 8 Q. Based on something that you had learned from
 9 somebody you had in the field?
 10 A. From the meetings that the organizers have and
 11 from the clients that come here, from reading the news,
 12 from -- you know, it's not just one thing, of course.
 13 You know, this is a decision where you want to spend
 14 your limited time that's very busy, you know, on a
 15 lawsuit or in depositions, right. So it's not an easy
 16 decision.
 17 So it's looking at the impact that it's going
 18 to have on a community; the community where I live, the
 19 community that I represent in my role as an executive
 20 director, a community that I know very well. And so
 21 through all of those different things, I decided, right,
 22 with some of the staff that this is what we should do.
 23 Q. You mentioned you had been deposed in the
 24 previous voter ID lawsuit?
 25 A. Yes, uh-huh, I did.

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1 we need to do educating. Because the lawsuit is only
 2 one piece of it, right? There's a whole other thing in
 3 educating that needs to happen so that the impact is
 4 felt less.
 5 Q. Do you remember specifically about this lawsuit
 6 how LUPE decided to get involved?
 7 A. We -- through -- through the avenues that I
 8 have discussed. And then we also belong to a coalition
 9 of different non-profit organizations. It was an issue
 10 that came up again. We have a group that is made up
 11 just of executive directors and we discussed this issue
 12 and everybody was of the same feeling, that it would
 13 have a negative impact, and then we decided, you know.
 14 Not that I needed for them to decide, I decided for our
 15 membership based on conversations.
 16 Q. What is that coalition of --
 17 A. Right.
 18 Q. -- executive directors called?
 19 A. It's called Voces Unidas, Equal Voice Network.
 20 Q. And which executive director -- so that's made
 21 up of executive directors from different organizations?
 22 A. Of many different organizations.
 23 Q. Do you know which organizations?
 24 A. Yeah, there's different ones. I think there's
 25 like ten or 12 different organizations. Some are

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1 Q. Which, if we need to bring it up, we will call
 2 that Texas v. Holder because that's what that case was
 3 called.
 4 A. Oh.
 5 Q. Texas versus Holder. It was the previous voter
 6 ID lawsuit.
 7 A. Okay. I don't know who it was, but I was
 8 deposed on that.
 9 Q. Other than this case and Texas v. Holder, has
 10 LUPE gotten involved in any litigation previously?
 11 A. Oh, yes, uh-huh, we have.
 12 Q. What sorts of issues?
 13 A. Way back when -- I think it was in the -- in
 14 the '80s when farm workers were denied the right to
 15 unemployment compensation. There was like a freeze, a
 16 huge freeze that devastated the crops in the fields.
 17 And we would send our memberships from the union at that
 18 time, the United Farm Workers, to the Texas Employment
 19 Office and we found out that in the '30s when the laws
 20 were read and farm workers were left out of receiving
 21 unemployment compensation.
 22 So the farm workers would go and they would
 23 come back and say, there's nothing for us. And we
 24 didn't -- we said, well, why? There's unemployment and
 25 it wasn't your fault, it was nature that finished the

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1 crops. And so at that time we filed a lawsuit. Oh, you
2 said LUPE. This is under United Farm Workers. Do you
3 want just LUPE? I can just do LUPE.

4 Q. Just LUPE.

5 A. Sorry. I went way back. Okay. LUPE. Yes, we
6 filed against Janet Napolitano when she was the
7 Secretary of Homeland Security because when there is a
8 hurricane -- when it's hurricane season and we were
9 concerned about the routes out of the Valley that we
10 could evacuate safely. And it was for the whole
11 community, not just members because we felt that if --
12 if they were going to check our documents leaving on the
13 bus, if they were going to check our documents at the
14 crossing here, you know, it's in -- where is it, Encino?
15 Or just a little --

16 Q. I think there's one in Falfurrias.

17 A. -- before Falfurrias. Well, no, this other way
18 on 281. And we felt that it could bottleneck there and
19 that people could be, you know, in danger of -- and then
20 Homeland Security had come in to the McAllen Civic
21 Center and they did a whole training for people. And in
22 that, it came out in the news that the Homeland Security
23 said that they were going to ask for documents. And we
24 said, but you know, how is that possible? Do they not
25 understand that we only have one route out? On here

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1 Q. Have there been any other voting rights
2 lawsuits that --

3 A. Oh, you only asked about voting rights?

4 Q. I did not only ask about it, but now I am.

5 A. I said, well, you should have told me that
6 because I went into this whole explanation.

7 Oh, okay. So it's not just about voting
8 rights, but now about voting rights?

9 Q. Yes, ma'am.

10 A. Well, just the one you mentioned earlier, that
11 one, uh-huh.

12 Q. Okay. Besides the one that's going on now?

13 A. And the --

14 Q. And the previous Texas v. Holder, the ID
15 lawsuit?

16 A. That one, uh-huh.

17 Q. Any other voting rights?

18 A. No, not voting rights. A different -- against
19 the government for different things that they have done
20 that has a negative impact on people we have, but on
21 voting rights, I think it's just this -- I think it's
22 just these two.

23 Q. Okay. Is it your opinion that the United
24 States Government cannot win this case without your
25 participation?

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1 it's 281. And how it's going to bottleneck everything.

2 And so we filed against her.

3 Q. When you say "documents," you mean immigration
4 documents?

5 A. Yes, uh-huh. They said -- immigration said
6 that they would -- that they would let people on the bus
7 that had documents. And the ones that didn't have
8 documents, they will have special shelters. And we
9 filed because we said, you know, they're really -- where
10 is their head because they don't understand that in a
11 family, you have citizens and you have undocumented in
12 one family.

13 So that means that they're going to get the
14 mother and the grandmother not, or the father and the
15 mother not or the kid. That's going to create a crisis
16 in the Valley. And not just for the people that we
17 represent, it's for everybody. And so we filed a
18 lawsuit against her.

19 Q. So that was against Homeland Security?

20 A. Yes, and Janet Napolitano in her role as . . .

21 Q. Would you characterize that as being an
22 immigration-related lawsuit?

23 A. An immigration-related lawsuit?

24 Q. Was it a voting rights lawsuit?

25 A. No.

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1 A. That they cannot win? I pray that that's -- I
2 want it to -- I want them to not to win. So are you
3 saying that if I didn't -- if I don't -- if I'm not part
4 of it as LUPE, the government won't win?

5 Q. I'm asking if LUPE was not a part of this
6 lawsuit --

7 A. Okay.

8 Q. -- do you believe that the United States
9 Government would still be able to win this lawsuit? And
10 when I mean "the United States Government," I mean the
11 Department of Justice.

12 A. You-all?

13 MS. VAN DALEN: No.

14 Q. (By Mr. Whitley) No, I'm from the Texas
15 Attorney General's office.

16 A. Okay.

17 Q. So I represent the defendants, so I'm defending
18 the law.

19 A. You're defending the State?

20 Q. That's right.

21 A. Okay.

22 Q. And when I say "the law," I meant SB 14. I
23 apologize if I was unclear. The United States is one of
24 the plaintiffs in this lawsuit along with LUPE.

25 A. Okay.

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1 Q. And the United States has also sued the
2 defendants in this action.
3 A. Who has sued?
4 Q. The United States.
5 A. Okay.
6 Q. So my question to you is: The United States is
7 a plaintiff, LUPE is a plaintiff.
8 A. Okay.
9 Q. Is it your belief that if LUPE was not a
10 plaintiff in this lawsuit, that the United States would
11 lose?
12 MS. VAN DALEN: And I'm going to object to
13 the question.
14 A. I'm not -- I'm not understanding it, I guess,
15 really well, but I want us to win. And if I -- and
16 if -- "us," I mean LUPE. And if I can help, if LUPE can
17 help in that, I would want that. We would want that to
18 be.
19 Q. Fair enough. It was a tough question.
20 A. Yeah.
21 MS. VAN DALEN: And we've objected to it
22 also in writing.
23 THE WITNESS: Okay.
24 A. You involved too many people there, the United
25 States and the State and --

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1 staff person would or just me?
2 Q. I'm asking about anybody --
3 A. Anybody with that?
4 Q. -- who would be representing LUPE.
5 A. No, it would be me.
6 Q. Okay.
7 A. I don't recall having -- I don't recall, but if
8 I -- if I -- I really don't recall doing that because we
9 weren't -- I don't know why it happened, but I don't
10 remember a lot of news when you-all were doing this. I
11 don't remember that a lot of news came out. But if --
12 if it had been -- if it had been very public, I probably
13 would have called them.
14 Q. Do you remember specifically whether or not you
15 did?
16 A. No, I don't remember whether I did or not. But
17 maybe after I found out about it, maybe way later when
18 it passed, I probably -- in my role, I probably would
19 have called and I probably would have called them and
20 probably just got after them, why didn't they do more to
21 stop it.
22 Q. Do you remember specific --
23 A. But I don't -- no, I don't. I'm saying that in
24 my role in other bills, that's probably what I would
25 have done, right.

55

1 Q. I apologize.
2 A. And everybody, right? I didn't --
3 Q. I'm not trying to confuse you.
4 A. Yeah. No, that's okay, we got it, I think.
5 Q. Have you been promised or offered anything for
6 participating in this lawsuit?
7 A. Offered anything? No.
8 Q. Have you been promised anything for
9 participating in this lawsuit?
10 A. No.
11 MS. VAN DALEN: I told her I would get
12 lunch today.
13 A. And for you, too.
14 Q. And I appreciate it. Other than lunch today
15 during the break, the answer to the previous questions
16 were no?
17 A. No, no, no.
18 Q. Before SB 14 passed, did you communicate with
19 your state senator or state representative about the
20 bill?
21 A. Not that I recall that we did or didn't.
22 Q. And when I say "you" here, I'm referring to
23 LUPE as an organization or you personally representing
24 LUPE.
25 A. Are you saying -- are you asking if another

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1 Q. Have you done that for other bills?
2 A. Yes, uh-huh.
3 Q. Do you remember specifically what bills you
4 have?
5 A. In -- I think it was in the session -- I don't
6 remember if it was 2011 session or 2010 session. There
7 were over 100 pieces of anti-immigrant legislation that
8 was introduced by some very conservative people,
9 representatives, and so I did -- I did that then.
10 Q. And it was you representing LUPE?
11 A. Yes, it was.
12 Q. Opposing those anti-immigrant bills?
13 A. Correct, yes.
14 Q. Have you ever contacted or communicated with
15 your state senator or state rep --
16 A. Oh, many times.
17 Q. -- other than those bills that you just
18 mentioned regarding --
19 A. Yes.
20 Q. -- immigration? Have you ever contacted them
21 about voting rights bills?
22 A. Yes, these two bills.
23 Q. Which two bills do you refer to?
24 A. The first one that we were involved in in the
25 lawsuit. But, again, it wasn't -- I don't remember it

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1 being during the session because I don't remember it
 2 being very public information during the session. But
 3 what I am saying is if it -- afterwards when they
 4 announced it that it had passed, it would not be rare
 5 for me to call them and say, you know, what is this and
 6 how disappointed and why -- and what can we do.
 7 Q. I just want to get clear for the record. There
 8 have been two lawsuits --

9 A. Yes.

10 Q. -- on one bill.

11 A. Okay.

12 Q. So this is just one bill. And I know it's easy
 13 to confuse. And I get confused, too.

14 A. Oh, I thought it was two different bills.

15 Q. So SB 14 is just one bill. There have been two
 16 different lawsuits. This is the second one.

17 A. Okay.

18 Q. And I also want to get clear for the record,
 19 did you contact your state senator or state
 20 representative, either before SB 14 was passed or after
 21 it was passed regarding SB 14?

22 MS. VAN DALEN: And I'm going to object
 23 that she's answered -- you've asked and she's answered
 24 that question, but you can try again.

25 A. Well, I don't remember, like I said, if it was

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1 representative?

2 A. Not that I can recall right now.

3 MS. VAN DALEN: An example of a voting
 4 rights bill would be like redistricting or changes to
 5 voter registration practices.

6 A. Oh, yeah. Oh, yes, yes. Yeah, there was.

7 Q. I apologize for not clarifying that.

8 A. Oh, yes, definitely we were involved in that,
 9 uh-huh.

10 Q. And so let's bring up redistricting as an
 11 example. Did you contact your state senator or state
 12 rep regarding redistricting?

13 A. And my congressman. And actually, I testified
 14 in that one, too.

15 Q. Did you testify in Austin?

16 A. Yes.

17 Q. Did you testify in Washington, D.C.?

18 A. No.

19 Q. When you testified in Austin, was that
 20 regarding the redistricting bill?

21 A. Yes.

22 Q. Do you remember when that was?

23 A. No. Maybe they started this redistricting
 24 when, maybe six or eight years ago. It's been a while.
 25 I don't recall the year, but it was -- it hasn't been in

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1 before because it wasn't too public. But if -- if I
 2 did, it would have been after -- after. I wish I had
 3 found out about it before and I probably would have.
 4 Q. Do you remember any other voting rights bills
 5 that you contacted your state senator or state rep about
 6 other than SB 14?

7 A. There's been others, other type of voting ID
 8 that hasn't passed, legislation that has been introduced
 9 and where they have tried to make it more difficult for
 10 people to vote, but that didn't pass. But I do remember
 11 that there have been other intents and I would have
 12 called them about that.

13 Q. Do you remember specifically whether or not you
 14 did?

15 A. I don't remember specifically because I don't
 16 remember how long ago it was and what session it was,
 17 but I do -- I do vaguely remember that there was another
 18 intent to put some obstacles on voting, but I don't --
 19 but I do know that it didn't pass because we're arguing
 20 about this one now, right? So this is probably the only
 21 one that passed. But there were others that were
 22 introduced or talked about in the legislature.

23 Q. So other than bills that were about voter ID,
 24 are there any other voting rights bills that you've
 25 discussed with your state senator or state

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1 the last four years, that I'm sure of. So it was
 2 further back.

3 Q. Okay.

4 A. It was the one with the -- it was a
 5 congressional because it was our congressman that I was
 6 working with.

7 Q. And what congressman is that?

8 A. Ours was -- well, they redistrict it again so
 9 maybe there is another one. That one I didn't testify
 10 in. It was Ruben Hinojosa. But now -- when they
 11 redistricted it again, now it's Filemon Vela.

12 Q. And I asked you before about your state senator
 13 or your state representative. Now I'm going to ask
 14 broadly --

15 A. Okay.

16 Q. -- whether or not you discussed SB 14, this
 17 voter ID bill, with any state senator or any state
 18 representative.

19 A. With our state senator.

20 Q. With --

21 A. About this one, SB 14?

22 Q. Yes.

23 A. Again, if I did, it would have been after the
 24 fact because I didn't hear about it until at the end.

25 Q. Who is your state senator?

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1 A. Juan "Chuy" Hinojosa.
 2 Q. Will you be seeking any attorneys' fees in this
 3 lawsuit?
 4 A. No. In all of our lawsuits, that has never
 5 been the case.
 6 Q. And you mentioned earlier that you made the
 7 decision that LUPE would become a plaintiff --
 8 A. Uh-huh.
 9 Q. -- in this case.
 10 MS. VAN DALEN: I'm just going to -- just
 11 backing up. There has been a claim for attorneys' fees
 12 made in this case.
 13 THE WITNESS: But he's asking for LUPE.
 14 MS. VAN DALEN: But to clarify, they would
 15 not go to the organization, they would go to . . .
 16 THE WITNESS: Okay.
 17 MR. WHITLEY: So in their complaint they
 18 requested --
 19 MS. VAN DALEN: There's a fees claim,
 20 yeah.
 21 MR. WHITLEY: When I say "their," I mean
 22 LUPE.
 23 Q. (By Mr. Whitley) When -- after you made the
 24 decision that LUPE would become a plaintiff in this
 25 case, when did you hire your attorney?

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1 A. Oh, my, it was months and months after,
 2 actually. It was the more -- it took months because we
 3 kept learning more and more things about the voter ID,
 4 that -- the SB 14 that -- we kept learning about it and
 5 learning about it, and the more we learned, the worse it
 6 got and the worse it got. And so finally I think it
 7 would have been months because it's been maybe only two
 8 months since we have the attorney, or maybe three at the
 9 most. So there was a lot that happened before -- or
 10 maybe longer.
 11 Q. You mentioned that you learned about "it."
 12 Were you learning about the lawsuit or the bill?
 13 A. Oh, the bill.
 14 Q. Where did you get most of your information?
 15 A. Again, from -- from reading, from -- from
 16 radio, from TV, from -- of the actual bill from there,
 17 of the impacts, obviously it was from the community.
 18 Q. What were you reading?
 19 A. What was going to be --
 20 Q. From where were you reading? Was it from
 21 newspapers? The Guardian?
 22 A. Again, like I said earlier, the Guardian and
 23 the New York Times or the Huffington Post or the LA
 24 or -- you know, one of those.
 25 Q. When you were learning that the bill was

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1 getting, according to your words, worse and worse --
 2 A. Right.
 3 Q. -- did you get information from any other
 4 source?
 5 A. From the community.
 6 Q. And those would have been through LUPE's
 7 organizers?
 8 A. With the LUPE organizers, but just the
 9 community because, you know, if we're in the news, and
 10 sometimes if I go -- wherever I'm at, people see me and
 11 they say, oh, you were in the news about this and this
 12 and, you know, thank you for doing that because it
 13 was -- it wasn't right what they were doing or it's
 14 going to have an impact on me. You know, so I can't
 15 just say that it was just from LUPE that I was hearing
 16 or the organizers, but the community.
 17 Q. Okay. So when you made the decision that LUPE
 18 would get involved in the lawsuit --
 19 A. Right, right.
 20 Q. -- how long after that did you hire your
 21 attorney?
 22 A. How long after we made the -- oh, maybe -- it's
 23 hard to say. Maybe -- I don't know. Months. Maybe two
 24 months or three months after.
 25 MS. VAN DALEN: David, could you -- and

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1 you can tell me when I'm getting into your business too
 2 much, but could you show her the original complaint or
 3 just tell her what the date was because I think that
 4 might refresh her recollection.
 5 THE WITNESS: I don't remember.
 6 MR. WHITLEY: Absolutely. And we can mark
 7 this as Exhibit 2 I believe we're on.
 8 (Exhibit No. 2 was marked.)
 9 Q. (By Mr. Whitley) And Ms. Cox, that is the
 10 first amended complaint.
 11 A. Okay.
 12 Q. So there would have been a complaint that was
 13 filed before that.
 14 MS. VAN DALEN: And that's the date I was
 15 suggesting might be helpful. Maybe you can just
 16 represent on the record when that was.
 17 Q. (By Mr. Whitley) And I can represent that the
 18 first complaint was filed in November, November 5th.
 19 A. Okay. Of this year?
 20 Q. 2013.
 21 A. Of 2013. Okay.
 22 Q. And so I believe your lawyer's signature is on
 23 that pleading?
 24 A. On this one?
 25 Q. On the original one.

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1 A. Okay.
 2 Q. I can verify that. It is.
 3 A. Time flies.
 4 Q. It does indeed. So how soon before November
 5 5th, 2013 when the original complaint was filed on
 6 behalf of LUPE did you decide that LUPE was going to get
 7 involved in the lawsuit?
 8 MS. VAN DALEN: If you remember.
 9 A. I'm really trying, but I can't. I don't
 10 remember.
 11 Q. Okay. And did you reach out to your attorneys?
 12 MS. VAN DALEN: I'm going to object to
 13 that question in seeking information that's privileged,
 14 attorney/client communications.
 15 THE WITNESS: Don't answer?
 16 MS. VAN DALEN: No, don't answer.
 17 Q. (By Mr. Whitley) In the previous lawsuit, did
 18 you contact your attorneys?
 19 A. In previous lawsuits? And usually that is the
 20 case, I go to --
 21 Q. In the previous voter ID lawsuit that was Texas
 22 v. Holder, the previous lawsuit that involved this bill
 23 that you were deposed in.
 24 A. Right, uh-huh.
 25 Q. When LUPE decided to get involved in that

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1 THE WITNESS: Yeah.
 2 Q. (By Mr. Whitley) So other than the deposition
 3 prep that we discussed earlier --
 4 A. Right.
 5 Q. -- have you met with your lawyer or any of your
 6 other lawyers -- and when I say "lawyers," is it fair to
 7 say that that's -- that they're all from Rio Grande
 8 Legal Aid, Inc.?
 9 MS. VAN DALEN: Yes.
 10 MR. WHITLEY: And then is Jose Garza from
 11 Rio Grande Legal Aid?
 12 MS. VAN DALEN: He has been representing
 13 LUPE in his capacity as a staff attorney for Texas Rio
 14 Grande Legal Aid.
 15 Q. (By Mr. Whitley) Are there any other attorneys
 16 besides those that work for Rio Grande Legal Aid that
 17 represent LUPE?
 18 A. In this case?
 19 Q. Yes.
 20 A. No.
 21 Q. Okay. So I'm going to ask that question again
 22 now that we have that straight.
 23 A. Okay.
 24 Q. Have you met with your lawyers in this case in
 25 person before today's deposition other than for the

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1 lawsuit --
 2 A. Right, uh-huh.
 3 Q. -- did you contact your attorney?
 4 MS. VAN DALEN: And again, I'm going to
 5 object to the question as seeking information protected
 6 by the attorney/client privilege and direct the witness
 7 not to answer.
 8 Q. (By Mr. Whitley) Did you speak to any other
 9 lawyers when considering whether to become a plaintiff
 10 in this suit?
 11 A. In this current one? To other lawyers.
 12 MS. VAN DALEN: Other than Legal Aid
 13 attorneys.
 14 A. Well, I may have talked to our immigration
 15 attorney about it, about what we wanted to do, but he's
 16 not an attorney in -- he's not the attorney in this
 17 case.
 18 Q. And how much are you paying your lawyer per
 19 hour to represent you?
 20 A. I have no idea. I have no idea. I just -- I
 21 just know that they've been -- Legal Aid has been good
 22 representatives of the community when we've had to file
 23 lawsuits. But I don't know that they charge at all.
 24 MS. VAN DALEN: And I can stipulate on the
 25 record that we're not charging LUPE for our services.

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1 deposition prep?
 2 A. On this suit, not just the deposition part --
 3 Q. That's right. That's correct.
 4 A. -- but others?
 5 Q. That's correct.
 6 A. Yeah, we met once with Jose Garza, it was like
 7 maybe 15 minutes.
 8 MS. VAN DALEN: You can just say yes, yes
 9 or no.
 10 THE WITNESS: Oh, okay.
 11 A. Yes.
 12 Q. When was that?
 13 A. I don't recall. I don't recall when that was.
 14 Q. Was it after the lawsuit was filed in early
 15 November?
 16 A. I don't recall. I just recall that it was very
 17 brief because -- I don't recall. It was a very brief
 18 visit, so I don't recall when that was.
 19 Q. How long was the visit?
 20 A. Oh, maybe -- oh, maybe ten minutes, 15 minutes.
 21 It was really quick because he had a flight to take.
 22 Q. Was it here in the office?
 23 A. Yes, uh-huh.
 24 Q. Other than that occasion, have you met with any
 25 of your lawyers about this lawsuit?

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1 A. With Marinda, uh-huh.
 2 Q. You've met with Marinda previously about this
 3 lawsuit other than the depo prep that you guys did
 4 yesterday?
 5 A. Yes, uh-huh.
 6 Q. When was that?
 7 A. I don't recall when it was, but I remember that
 8 it was after you were asking for some documents and she
 9 had to get them from me.
 10 Q. And was that in person as well?
 11 A. Yes, because she came to pick up the documents.
 12 Q. Was that here at the office?
 13 A. Yes, uh-huh.
 14 Q. Do you remember how long that meeting was?
 15 A. No, I don't remember.
 16 Q. So other than the meeting with Mr. Garza that
 17 you don't remember when it took place and the two
 18 meetings with Marinda, have you met with any of your
 19 attorneys about this lawsuit in person?
 20 A. No.
 21 Q. Have you spoken with your lawyers over the
 22 phone before today's deposition?
 23 A. Yes, uh-huh.
 24 Q. Do you know when those conversations took
 25 place?

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1 A. No. It wasn't like months ago. I mean, it
 2 was -- it was during this time, maybe -- maybe last
 3 month.
 4 Q. Do you know how many occasions you've spoken
 5 with your lawyers on the phone, or any one lawyer in
 6 this lawsuit?
 7 A. Maybe once.
 8 MS. VAN DALEN: David, I appreciate you
 9 not asking about the actual communications, but
 10 nonetheless, I think this is borderline harassment. I
 11 mean, we haven't waived any privilege, nobody else has
 12 been present during these communications, we're trying
 13 to meet with our clients who participate and help
 14 facilitate responding to discovery, etcetera, so if you
 15 can move on.
 16 MR. WHITLEY: I certainly don't intend to
 17 harass, and I'm certainly not asking for any privileged
 18 information.
 19 Q. (By Mr. Whitley) What is your date of birth?
 20 A. What is my date of birth?
 21 Q. Yes, ma'am.
 22 A. March 22nd, 1947.
 23 Q. And where did you grow up?
 24 A. Here in the Valley.
 25 Q. And your current home address is in Donna, you

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1 mentioned?
 2 A. Yes, uh-huh.
 3 Q. Do you know where the closest Department of
 4 Public Safety driver's license office is?
 5 A. In -- from here, from San Juan, I think the
 6 closest one would be, I think, Edinburg.
 7 Q. Edinburg?
 8 A. I think so.
 9 Q. Does the regional office that's between here
 10 and Harlingen issue driver's licenses?
 11 A. I don't know. I don't know if there's a
 12 regional office here.
 13 Q. I saw a sign on my drive on the way.
 14 A. Oh, I don't know. I know there's one in
 15 Edinburg, uh-huh.
 16 Q. How far away is Edinburg?
 17 A. Maybe 25 minutes or so.
 18 Q. Do you know what forms of identification you
 19 need to show in order to be able to vote under SB 14?
 20 A. Under SB 14, well, there's a list. There's a
 21 list of them. I know one is a driver's license, a birth
 22 certificate. And I remember one because I couldn't
 23 believe that they didn't accept the student ID, but they
 24 would accept a gun ID or a gun permit or something like
 25 that, which I thought was absolutely awful. But anyway,

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1 that's one of them. I don't remember the others.
 2 Q. So you mentioned a driver's license?
 3 A. Right, yeah.
 4 Q. And a concealed handgun license?
 5 A. Is that what that one is? Yes, uh-huh.
 6 Q. Are you aware that a Texas personal
 7 identification card is acceptable on election date to
 8 vote?
 9 A. I think that's on the list, too.
 10 Q. Are you aware that a U.S. passbook --
 11 A. Yes, I saw that on the list, too.
 12 Q. I mispronounced that.
 13 A. Passport. Yes.
 14 Q. Passport book or card is acceptable on election
 15 day to vote?
 16 A. I don't know if it says book; it says a U.S.
 17 passport.
 18 Q. Are you aware that a U.S. military ID with a
 19 photo is acceptable on election day to prove your
 20 identity?
 21 A. I don't remember that one.
 22 Q. And are you aware that a U.S. citizenship
 23 certificate or certificate of naturalization with a
 24 photo is acceptable?
 25 A. I think I saw that one, yes.

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1 Q. Were you made aware of these during the
2 previous litigation?
3 A. I saw them on the -- I saw them on the
4 information that went out, you know, when the -- when
5 the bill passed. The State, I think it was, sent out
6 information as to what was going to be required. And it
7 had that list on there.
8 Q. Has anyone from LUPE offered to tell anyone
9 what forms of identification are needed to be able to
10 vote in Texas?
11 A. Has anyone from LUPE offered to -- yeah.
12 Q. And who would LUPE have given this information
13 to?
14 A. To the community. And that's a lot of staff at
15 LUPE, not just one staff. Because remember I said we
16 have five organizers that work out in the community,
17 plus the social service providers.
18 Q. I do remember that.
19 A. Okay. So that -- so it's those people.
20 Q. So --
21 A. That staff, I mean.
22 Q. Through those two groups of people, the
23 requirements to vote on election day are communicated to
24 LUPE's members and the general community?
25 A. Yeah, because we want to make sure that they --

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1 people who need to obtain one of the forms of
2 identification needed to vote under --
3 A. Do I know if it's available?
4 Q. Uh-huh. Under SB 14?
5 A. No. Do I know if it's available for free? I
6 think I heard something -- something about that it --
7 later, I think, it was that it was free, that they could
8 be provided for free, yes.
9 Q. Do you know what the free ID is called?
10 A. Isn't it the Texas ID?
11 Q. It's a -- the free one is the election
12 identification certificate.
13 A. The one we have now, the voter card?
14 Q. So you've got your driver's license?
15 A. Yes.
16 Q. So you don't need an election identification
17 certificate.
18 A. Okay.
19 MS. VAN DALEN: It's a photo ID that can
20 be used only for voting.
21 A. I haven't seen one of those.
22 Q. Were you aware that it existed?
23 A. Vaguely I remember somebody saying that it
24 existed.
25 Q. Do you know that there's no expiration date for

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1 that they vote, right. And we communicated that. And
2 that's when we found out that it would have a negative
3 impact because many of them didn't have that.
4 Q. And are there specific pieces of information
5 that LUPE uses to get that message across when those two
6 groups of LUPE agents are out in the field?
7 A. Yeah, like a flyer. We put it on paper and
8 hand it out.
9 Q. Is that the voter ID flyer that we mentioned
10 earlier in the deposition that's already been produced?
11 A. Yes, we have a flyer that we give out -- we
12 gave out.
13 Q. And you can confirm that it's already been
14 produced to us in the litigation?
15 A. Yes, I turned it over.
16 Q. Okay. Has anyone from LUPE offered to take
17 anyone to get one of the forms of identification to be
18 able to vote in Texas?
19 A. No, we can't. We're really very busy. And
20 when you go to the -- like when I go to renew my
21 license, it's like an all day thing. There's lines.
22 There's always lines. Right. And so it takes a long
23 time. So we don't have the staff or the resources to be
24 able to do that. It would be good, but we just can't.
25 Q. Do you know whether a free ID is available to

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1 those IDs that I mentioned? And we'll call them EICs
2 because they're election identification certificates.
3 A. No, I didn't know that.
4 Q. Did you know there's no -- well, let me finish
5 my question.
6 A. Okay.
7 Q. Do you know there's no expiration date for EICs
8 issued to citizens 70 years of age or older?
9 A. That it's --
10 Q. So if you're 70 or older --
11 A. Uh-huh.
12 Q. -- and you get issued an EIC, it does not
13 expire, did you know that?
14 A. No, I didn't know that.
15 Q. Are you aware of the supporting documentation
16 needed to obtain an election identification certificate?
17 You mentioned birth certificate earlier.
18 A. Right, right.
19 Q. Do you know any of the other ones?
20 A. The birth certificate, to get it. Probably the
21 passport, the driver's license, and the gun permit.
22 Q. I don't think you can use the gun permit.
23 MS. VAN DALEN: Or the passport or the
24 driver's license.
25 MR. WHITLEY: Well, you can use --

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1 MS. VAN DALEN: An old one.
 2 MR. WHITLEY: Yeah, you can use an old
 3 driver's license. You're exactly right.
 4 THE WITNESS: Well, I thought that's what
 5 you -- okay.
 6 MR. WHITLEY: An expired one.
 7 THE WITNESS: Okay.
 8 Q. (By Mr. Whitley) And that would be within two
 9 years of expiration. So you can go and present a
 10 driver's license that's been expired for, for example, a
 11 year and a half, and that's good enough to get an EIC.
 12 A. Okay.
 13 Q. And you mentioned birth certificate.
 14 A. Uh-huh.
 15 Q. Were you aware that an original or certified
 16 copy of a court order with the name and date of birth
 17 that indicates a name change and/or gender is acceptable
 18 as supporting identification?
 19 A. No, I didn't.
 20 Q. Are you aware that U.S. citizenship or
 21 naturalization papers without an identifiable photo is
 22 acceptable as supporting identification?
 23 A. Without a photo?
 24 Q. Uh-huh.
 25 A. The ones I've seen all have photos, so I

80

1 Q. So those are the supporting identifications I'm
 2 going through.
 3 A. Okay.
 4 Q. The supporting identification is what you use
 5 to get one of those EICs.
 6 A. Okay.
 7 Q. And I can continue through the list, but it's
 8 really long.
 9 A. Okay.
 10 Q. And --
 11 A. I don't think --
 12 Q. Based on your attorney's previous objections --
 13 and I'm not here to harass you.
 14 A. Right.
 15 Q. I do want to just kind of move along in the
 16 deposition by being able to cover these categories of
 17 supporting identification so you can confirm whether or
 18 not you know that somebody can use that to get an EIC.
 19 A. Well, you know, you can go through the list if
 20 you want, but that's not the only objection we have to
 21 the voter ID or the ability to get -- to be able to
 22 vote. You know, the transportation issue, the very
 23 remote area where colonias are at. You know, the
 24 elderly, you know, that might do this. And in the --
 25 then the bottom line is I just don't -- I just don't

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1 thought it was a naturalization with a photo.
 2 Q. And when I say "supporting identification,"
 3 that means a supporting document to get an EIC.
 4 A. No, I didn't know that.
 5 Q. Did you know that a voter registration card is
 6 an acceptable form of identification to get an EIC?
 7 A. I really hadn't heard about the EIC.
 8 Q. Okay. School records, had you heard that
 9 school records could be used?
 10 A. No.
 11 Q. Is it safe to say that you hadn't heard about
 12 any of the other supporting forms of identification to
 13 get an EIC?
 14 A. The EIC is the -- is -- you're saying that
 15 that -- that with your voter card you can vote, is that
 16 what you're saying?
 17 Q. You can vote without your voter card if you
 18 have your picture ID. And so the EIC is a picture ID
 19 that if you don't have one of the supporting forms of
 20 ID, like one of the other forms --
 21 A. Uh-huh.
 22 Q. -- and you need an EIC because you can't afford
 23 one of the other forms for various reasons, the EIC is
 24 the one that's used just for voting.
 25 A. Okay.

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1 understand -- I don't understand and I don't see any
 2 reason why you need to go -- why this list was
 3 established in the first place, you know. So I -- I
 4 just don't understand why we need this list of things
 5 when we could vote with a simple -- our voter card.
 6 Q. Let me go through some of the other categories.
 7 MS. VAN DALEN: Can I suggest -- can you
 8 just ask her if she knows what supporting documents are
 9 necessary in order to get an EIC and she can give her
 10 answer?
 11 Q. (By Mr. Whitley) Yeah. Do you know what
 12 supporting documents are needed to get an EIC?
 13 A. No.
 14 Q. Okay. Let's go into --
 15 A. But can I say -- can I again tell you why I
 16 don't think -- see, because to me --
 17 Q. Of course you can.
 18 A. It's just that I don't understand the reason
 19 why that has -- that is -- that was done, right? And so
 20 there's no -- there was -- it was fine the way it was
 21 where we were voting with our card. So, you know, we
 22 thank the State for trying to do this, but we don't get
 23 it, why it had to change.
 24 Q. So can you describe the purpose and mission of
 25 LUPE?

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1 A. Well, the purpose is to -- or the mission is
 2 to, you know, to help -- to help create a more just
 3 society and to -- just to create a more just society
 4 that respects the rights of human beings.
 5 Q. Is there a -- is there a stated mission of LUPE
 6 somewhere?
 7 A. Yes, uh-huh.
 8 Q. Is it on the website? Or is it in your --
 9 A. It is, uh-huh. And our core values also.
 10 Q. The core values are on your website?
 11 A. Yes, uh-huh.
 12 Q. And I think you mentioned earlier that LUPE has
 13 been in existence since 2003?
 14 A. Here in Texas, uh-huh.
 15 Q. Where did it exist before that?
 16 A. In California.
 17 Q. It's just California and Texas?
 18 A. No, and Arizona.
 19 Q. It started in California?
 20 A. Yes, uh-huh.
 21 Q. And how was it formed?
 22 A. It was formed by Cesar Chavez and Dolores
 23 Huerta in 1989 to -- because they already had the United
 24 Farm Workers that was dealing with grievances in the
 25 fields for farm workers, but they needed a non-profit

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1 Q. What is the upper limit? So on --
 2 A. Well, what fits. Because once we had a meeting
 3 where we didn't fit. It fits like -- it fits like 200.
 4 And then -- but sometimes they -- we have -- you know,
 5 we have to open the doors and it spills out outside. So
 6 we've had 500, 800. When we have the annual Cesar
 7 Chavez march, it's over 2,000. It's -- excuse me, over
 8 1,000.
 9 Q. So over 1,000 here in the union hall?
 10 A. No, in and out. They don't fit inside. Inside
 11 and outside.
 12 MS. VAN DALEN: Off the record for a
 13 second.
 14 (Off the record.)
 15 MR. WHITLEY: Back on the record.
 16 (Exhibit No. 3 was marked.)
 17 Q. (By Mr. Whitley) I have handed you what's been
 18 marked as Exhibit 3, I believe.
 19 A. Uh-huh.
 20 Q. And this is a page from LUPE's website --
 21 A. Oh, how nice.
 22 Q. -- that lays out your members.
 23 A. Yes.
 24 Q. What the description of your members, the
 25 membership, the following services and other free and

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1 organization to deal with some of the issues in the
 2 community like education or, you know, health, housing,
 3 immigration, those community issues, and that's why they
 4 created LUPE.
 5 Q. And does LUPE here that you're in charge of,
 6 does it have regular meetings of the membership?
 7 A. Oh, yes, uh-huh.
 8 Q. How often?
 9 A. Every first Friday of the month.
 10 Q. Where do they meet?
 11 A. Here. Not -- here in the hall, in the union
 12 hall back here.
 13 Q. Every first Friday of the month, you say?
 14 A. Every first Friday of the month.
 15 MS. VAN DALEN: I think five people is
 16 about the capacity of this office here.
 17 Q. (By Mr. Whitley) I was about to say certainly
 18 not in this office?
 19 A. No, not in this office. We have a nice union
 20 hall back here that accommodates the meetings.
 21 Q. How many people attend those meetings, just
 22 in --
 23 A. Oh, it varies. It varies. I think the -- I
 24 think the fewest that we have had range from maybe 80 to
 25 100 and then it's on up.

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1 discounted benefits.
 2 A. Yes.
 3 Q. And you can see the URL, the website address
 4 there at the bottom. And this was pulled yesterday.
 5 A. Yes.
 6 Q. So how many members does LUPE have?
 7 A. 7,000 plus.
 8 Q. And the cost for membership is \$40 a person?
 9 A. \$40 per person, \$60 for a married couple and
 10 the students are \$20.
 11 Q. And so do you renew -- does a member renew that
 12 membership every year?
 13 A. We sure love that. Some don't. Some do and
 14 some don't, but we do try to have them to renew, try to
 15 get them to renew.
 16 Q. How does one become a member?
 17 A. You just walk into the front and you get -- and
 18 you get like an application and you fill out the
 19 application and you present -- and you pay \$40 and you
 20 present something to identify you.
 21 Q. What kind of documentation is provided that
 22 identifies the people that want to become members?
 23 A. There's different kinds. You know, there's a
 24 number of different kinds of documents that you can
 25 bring.

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1 Q. Do you know which ones?
 2 A. Some of them. Like a school ID or a birth
 3 certificate from any country or an -- a license also.
 4 Q. So you mentioned earlier that you would like
 5 everybody to renew every year --
 6 A. Right.
 7 Q. -- but they don't always renew?
 8 A. Right. That's correct.
 9 Q. What happens when somebody doesn't renew? Do
 10 they get dropped?
 11 A. No. We -- not right away. I mean, we try to
 12 get them back. We call them and we visit them and we
 13 give them information.
 14 Q. Do you know how much of LUPE's revenue in a
 15 year comes from those membership dues?
 16 A. How much comes from the membership dues? I
 17 don't remember off of my head, but -- I don't remember.
 18 I have it somewhere, but I don't remember. I guess it
 19 would be easy to multiply that.
 20 Q. But that would be assuming everybody renews --
 21 all 7,000 renew every year, right? But we're not going
 22 to assume that because they don't.
 23 A. No, but these are not renewals, these are --
 24 this is -- this is -- this is a yearly. This is what we
 25 have. We're not counting -- in this number, we don't

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1 Q. And they all paid \$40.
 2 A. Okay.
 3 Q. And they weren't married and they weren't
 4 students.
 5 A. Okay.
 6 Q. That would be about \$280,000?
 7 A. I guess.
 8 Q. So would it be safe to assume that LUPE gets
 9 somewhere less than that every year from dues?
 10 MS. VAN DALEN: I'm going to object,
 11 assumes facts not in evidence. You can try to answer.
 12 A. I think it's about that amount.
 13 Q. Okay. And are there different levels of
 14 membership based on how people become a member at all?
 15 Or is it just you're a member of LUPE and that's it?
 16 A. Yes. Well, you're a member -- wait. What they
 17 pay, you're saying? What they pay as fees?
 18 Q. Not necessarily. That could be one of the
 19 categories. But what I'm asking is more generally. Out
 20 of all the 7,000 members, are there different categories
 21 of members or --
 22 A. The student and the married couple and -- yeah.
 23 Q. Those are the only categories?
 24 A. Uh-huh.
 25 Q. Okay.

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1 count people that haven't renewed.
 2 Q. Oh, okay.
 3 A. It's an up-to-date database.
 4 Q. So on any given year you can count on 7,000
 5 members?
 6 A. 6,000, 7,000, 8,000, yeah.
 7 Q. So assuming each of those -- let's call it
 8 7,000.
 9 A. Yeah, the only issue with that is that we
 10 wouldn't know how many are students --
 11 Q. Right.
 12 A. -- or how many are couples, you know. That
 13 would be --
 14 Q. Or how many are renewing. Is it true that when
 15 you renew, do you get a discount?
 16 A. Yes. Wow, you do know. Did you just read
 17 this?
 18 Q. I'm looking at it with you.
 19 A. Does it say that, that you get a discount? Oh,
 20 there it is. Yes, they do get.
 21 Q. Okay.
 22 A. Yes, I see it.
 23 Q. So assuming all of the 7,000 were first time
 24 members.
 25 A. Right.

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1 A. Yeah.
 2 Q. Is LUPE a partisan organization?
 3 A. We are 501(c)(3).
 4 Q. Do you represent any given party, Republican or
 5 Democrat?
 6 A. As a 501(c)(3), you can't.
 7 Q. Okay. Does LUPE accept African American
 8 members?
 9 A. Yes, of course.
 10 Q. Are there any African American members of LUPE
 11 currently?
 12 A. I don't think so. We don't have a very large
 13 African American community here in the Valley. I think
 14 it's -- I don't think we have very many. It's mainly
 15 Mexican.
 16 Q. Does LUPE accept white members?
 17 A. Definitely.
 18 Q. Does LUPE currently have any white members?
 19 A. We do, actually. Not, of course -- not very
 20 many because, again, the Valley is mainly predominantly
 21 Mexican American, but we do.
 22 Q. Does LUPE accept -- would it be fair to say
 23 that LUPE accepts all other ethnicities if somebody
 24 wants to become a member of LUPE?
 25 A. All other ethnicities and also whatever

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1 profession you're in. You know, accepts lawyers.
 2 MS. VAN DALEN: She's giving you the sale
 3 right now.
 4 THE WITNESS: You know, teachers.
 5 MR. WHITLEY: Sales pitch. I don't even
 6 know if I have \$40 with me.
 7 A. We take credit -- we take your card, too.
 8 Somebody from the State, I think we can trust your card,
 9 right?
 10 Q. I don't know.
 11 A. We're in trouble.
 12 Q. Are there -- so are there any -- to your
 13 knowledge, are there currently any members of LUPE of
 14 any other ethnicity besides African American, white or
 15 Latino?
 16 A. Well, we have -- Latino includes like Central
 17 America and South America countries. If that's included
 18 in that description, we do.
 19 Q. Is that what your description of Latino
 20 includes for LUPE's purposes?
 21 A. Latinos are Hispanics, uh-huh.
 22 Q. What's the difference between that, between
 23 Latino and Hispanic to LUPE?
 24 A. I think Latinos is like it includes more, like
 25 people from not only Mexico, but Central American

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1 organizers and the social services people?
 2 A. And communications and fund developments and
 3 program managers. You know, there's others also.
 4 Q. And how would you describe who LUPE serves?
 5 A. We service the needs of the community, and that
 6 depends on what those needs are. In one community it
 7 could be the lack of transportation, the other one could
 8 be, you know, health issues. Immigration --
 9 MS. VAN DALEN: The question is who -- who
 10 you serve, not . . .
 11 A. What we serve.
 12 Q. Who?
 13 A. Who? Who do we serve? Well, we just went
 14 through the whole list of -- it's mainly the people that
 15 we have identified, low income and predominantly Mexican
 16 American, but there's others also.
 17 Q. Do you have to be a member of LUPE for LUPE to
 18 be able to serve you?
 19 A. No, you don't have to be a member of LUPE. We
 20 have -- we have folks that are not members, but they
 21 still need the services.
 22 Q. And so people who are not members of LUPE are
 23 able to get some of these services here on Exhibit 3?
 24 A. Exhibit 3?
 25 Q. Where it says --

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1 countries or South American countries and Hispanic -- I
 2 don't know if this is the way it is. That's how I just
 3 understand it is mainly --
 4 Q. Sure. And that's all I'm asking.
 5 A. -- Mexican American, Mexican people.
 6 Q. So besides how you would define Hispanics or
 7 Latinos, besides those two, white, African Americans,
 8 are there any members of any other ethnicity of LUPE
 9 right now?
 10 A. Maybe some Native Americans.
 11 Q. Do you know if there have ever been any other
 12 members from any other ethnicity of LUPE?
 13 A. Like what? Like which ones? Do you know of
 14 any more? I can't think of them. Do you know of some?
 15 MS. VAN DALEN: Southeast Asia.
 16 Q. (By Mr. Whitley) Sure. Asian?
 17 A. Probably not.
 18 Q. And I think you mentioned earlier when we were
 19 talking about your position, but remind me again, how
 20 many employees or staff does LUPE --
 21 A. It's like 25 or -- between 25 and 27, uh-huh.
 22 Q. And that's in all of the offices in South
 23 Texas?
 24 A. Yes, uh-huh, yes.
 25 Q. And of those 25 or 27, some of those are

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1 A. Where it says "other free and discount"?
 2 Q. Let's go -- so members receive the following
 3 services?
 4 A. Yes, they receive that.
 5 Q. And are there non-members of LUPE that receive
 6 those services?
 7 A. Yes.
 8 Q. Does LUPE maintain an active list of its
 9 members?
 10 A. An active? Yes, we try, uh-huh.
 11 Q. And you mentioned before that LUPE is a
 12 501(c)(3)?
 13 A. That is correct.
 14 Q. Which means that LUPE is a non-profit?
 15 A. Yes, we are a non-profit organization.
 16 Q. From where does LUPE receive funding? We've
 17 discussed earlier --
 18 A. The members.
 19 Q. -- the member fees?
 20 A. Uh-huh, yes.
 21 Q. Does LUPE receive donations?
 22 A. Yes, uh-huh.
 23 Q. Individual -- from individuals?
 24 A. Yes.
 25 Q. From corporations?

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1 A. No.
 2 Q. Does it receive sponsorships? Do people
 3 sponsor events that LUPE puts on?
 4 A. Yes.
 5 Q. And LUPE engages in some fund-raising, you
 6 mentioned before?
 7 A. A little bit, yeah, we're just starting that,
 8 uh-huh.
 9 Q. And the only dues that LUPE has are the \$40 a
 10 year dues?
 11 A. Or 60 or, yeah, or 20, uh-huh.
 12 Q. Depending on who you are?
 13 A. Right.
 14 Q. And that's represented on the website --
 15 A. Right.
 16 Q. -- as depicted in Exhibit 3?
 17 A. Uh-huh.
 18 Q. Do you know generally how those funds are
 19 allocated?
 20 A. How they are allocated? In our budget? No, I
 21 can't -- the money that comes in -- you asked earlier,
 22 you know, about the money that comes in and how we use
 23 it, is that -- I said for salaries and benefits.
 24 Q. Sure.
 25 A. And then the programs.

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1 Q. Or is it based on how many hours somebody
 2 spends to prepare?
 3 A. No, just on the -- on the complexity of what is
 4 required to fill your taxes.
 5 Q. Do you know about how much that usually costs
 6 for -- let's just pull an example of somebody who had
 7 used that service. Do you know how much that would cost
 8 somebody?
 9 A. I don't -- I don't know. I just know that like
 10 the 10 -- if you're a single person, what they call the
 11 1040EZ is like the least expensive one.
 12 Q. Do you know how expensive that is?
 13 A. Maybe 20 or 25. Between 20 and 30.
 14 Q. And that would be in addition to the \$40 fee to
 15 join LUPE, correct?
 16 A. Yes, but if they're already a member obviously.
 17 If they are a member and then they come just in for the
 18 taxes, we only charge them the taxes, not the membership
 19 because they're already members.
 20 Q. Right. So again, just to be clear for the
 21 record --
 22 A. Right.
 23 Q. -- if I wanted to become a member of LUPE
 24 today, I would pay \$40?
 25 A. Yes.

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1 Q. You mentioned salary, benefits.
 2 A. Benefits and the programs.
 3 Q. Programs?
 4 A. Right, uh-huh.
 5 Q. Anything else you can think of?
 6 A. Well, by programs, I mean the work that we do,
 7 our social services and our organizing, right? But the
 8 membership funding, we also -- we also charge for
 9 services, so there's some more money that comes in
 10 through our social services.
 11 Q. So a member of LUPE for the first time would
 12 pay \$40 to become a member?
 13 A. Uh-huh.
 14 Q. And then there are some services that LUPE
 15 provides that's an additional fee?
 16 A. Oh, yes, uh-huh.
 17 Q. What are those fees?
 18 A. That's a big part of it. It depends. For
 19 example, in the tax preparation, it depends if you're
 20 doing a 1040EZ, a 1040 or 1040X. You know, it just
 21 depends on what kind of income tax you're filing. The
 22 cost is based on that.
 23 Q. Is it based on the complexity of the filing and
 24 how many forms are required by the IRS?
 25 A. Yes.

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1 Q. Assuming my credit card got accepted.
 2 A. Okay.
 3 Q. And then if I wanted LUPE to help me with my
 4 taxes --
 5 A. That's extra.
 6 Q. -- I would come in and pay -- if it was only a
 7 1040EZ --
 8 A. Right.
 9 Q. -- I would pay \$25?
 10 A. Between 20 and 30. I'm not exactly -- yeah,
 11 20, 25 or 30.
 12 Q. Do any of the other services provided by LUPE
 13 require an additional fee to be paid?
 14 A. All of those that are listed there.
 15 Q. In Exhibit 3?
 16 A. Yes.
 17 MS. VAN DALEN: The ones that says
 18 "services at low cost"?
 19 THE WITNESS: Yeah.
 20 Q. (By Mr. Whitley) So tax preparation we've
 21 discussed.
 22 A. Uh-huh.
 23 Q. How much does immigration services run?
 24 A. It also depends on the form that you're filing.
 25 You know, is it for --

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1 Q. Let's go from low end to high end, if you know.
 2 A. I don't do -- I don't do immigration services,
 3 but I see the -- let's see. I think it goes from -- I
 4 think what they call the simple one is like a 990 when
 5 you renew. Your employment record, I think -- maybe
 6 that's --
 7 MS. VAN DALEN: I just caution you not to
 8 guess.
 9 A. I'm not sure.
 10 Q. Sure. If you're not sure, you're not sure.
 11 A. Right.
 12 Q. If you do know, let me know.
 13 A. I'm not sure because we have -- under
 14 immigration, it's a whole bunch of forms. There are
 15 like, oh, I would say that we fill out many -- like
 16 maybe 15 or 20 different kinds of forms that immigration
 17 requires and each one has a different cost.
 18 Q. Do you know how much one would cost?
 19 A. We just changed prices on them and we just
 20 changed the cost and I don't remember.
 21 Q. What did the cost change from? What was the
 22 old price?
 23 A. From -- we increased it. I think we increased
 24 it \$5 or \$10.
 25 Q. That was the amount of the increase?

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1 Q. And then the last thing on that list is birth
 2 certificate and marriage certificate translations?
 3 A. Right.
 4 Q. Do you know how much that would cost?
 5 A. No, because those are done as part of the --
 6 every immigration packet -- package includes those and
 7 that's part of the -- that's part of the cost.
 8 Q. So the cost of translating a birth certificate
 9 or marriage certificate would be --
 10 A. Go with immigration.
 11 Q. -- looped into the immigration services?
 12 A. Yes. It's required by immigration as part of
 13 that.
 14 Q. I think we're done with Exhibit 3.
 15 A. Oh, good. I thought you were going to say
 16 we're done.
 17 MS. VAN DALEN: That would be a gift.
 18 THE WITNESS: That would be so nice.
 19 Q. (By Mr. Whitley) So can you -- do you know
 20 whether or not LUPE has monitored voter ID legislation
 21 in other states besides Texas?
 22 A. Monitored? What does that -- what do you mean
 23 by that, monitor?
 24 Q. Monitor could mean specifically following a
 25 bill that was filed in another state or a law that was

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1 A. On each of the different -- or not on each. On
 2 some of the forms, the ones that we -- that the staff --
 3 social service staff is taking like longer on or needed
 4 a lot of copies, based on that.
 5 Q. So bigger forms require more copies?
 6 A. Yes.
 7 Q. And increase the fees?
 8 A. Yes, and more time.
 9 Q. Do you remember what the price of one form was
 10 before you increased it \$5 or \$10?
 11 A. For example, which one is it that they do?
 12 They do -- I think, for example, the FOIA that we do for
 13 immigration was -- I think before it was -- I want to
 14 say like maybe 40 and we went to 50.
 15 Q. Okay.
 16 A. Somewhere in there.
 17 Q. So that was immigration services?
 18 A. I think.
 19 Q. The next thing on the list in Exhibit 3 is
 20 notary services?
 21 A. Yes.
 22 Q. Do you know how much LUPE would charge for a
 23 notary service?
 24 A. Those are only like \$5. You know, like \$5,
 25 uh-huh.

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1 passed in another state. We're just talking about voter
 2 ID.
 3 A. Voter ID.
 4 MS. VAN DALEN: It could include reading
 5 about it in the paper.
 6 Q. (By Mr. Whitley) It could include reading
 7 about it in the paper, it could include following a
 8 lawsuit about another state's voter ID law.
 9 MS. VAN DALEN: Perhaps I should object
 10 because it's such a vague question.
 11 MR. WHITLEY: That's a big question.
 12 THE WITNESS: Yeah.
 13 Q. (By Mr. Whitley) So do you know of any other
 14 voter ID legislation in any other state besides Texas?
 15 Are you familiar with --
 16 A. I think -- I think I read about one in -- what
 17 state was it? Oklahoma? It was one of the southern --
 18 it was Oklahoma or -- I heard on the news on the TV
 19 about some law, some voter ID law that I said, wow,
 20 that's as bad as ours or worse. But I don't remember if
 21 it was -- if it was Oklahoma. It was -- or Michigan. I
 22 don't know. I don't remember. But I did -- I do
 23 remember hearing about other -- another state that
 24 had -- that had a voter ID issue.
 25 Q. Have you -- LUPE, has anyone from LUPE or you

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1 personally communicated with members of other state
 2 legislatures regarding any voter ID legislation?
 3 A. No, nuh-huh.
 4 Q. And have you exchanged documents or any
 5 materials about such legislation with other state's
 6 legislatures?
 7 A. No, nuh-huh.
 8 Q. Let's talk some more about voter outreach and
 9 voter education.
 10 A. Uh-huh.
 11 Q. You mentioned earlier that the organizers
 12 and -- remind me again the other category of people?
 13 A. Service providers.
 14 Q. And service providers educate the public about
 15 voter ID?
 16 A. Yes, uh-huh.
 17 Q. And you mentioned that they used a flyer. Do
 18 you know if there are any other resources used to
 19 educate the public on voter ID?
 20 MS. VAN DALEN: I'm going to object. I
 21 think that's a vague question.
 22 MR. WHITLEY: Okay.
 23 MS. VAN DALEN: You can answer.
 24 Q. (By Mr. Whitley) To the extent you know, you
 25 can answer.

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1 was. Yeah, I remember that event. And it was very
 2 expensive because at that place that we had it, even the
 3 water was very expensive. Yeah, we went to get a bottle
 4 of water and it was like \$1.50 or \$2, something like
 5 that.
 6 Q. That's less than what I paid for my water at
 7 the airport.
 8 A. I know, they really --
 9 Q. The airport gets you.
 10 A. So it was expensive there.
 11 Q. Does LUPE engage in any activities related to
 12 assisting voters during elections?
 13 A. Assisting meaning like there's many ways.
 14 Q. Let's go in terms of helping them to the polls.
 15 A. Very, very, very, very few. And like very --
 16 for example, we usually have a number that we give them
 17 to call the elections office, you know, but we don't do
 18 that. That would take a lot of -- we do some, but not
 19 very many.
 20 Q. The number that you give them to call is of the
 21 county elections office?
 22 A. Yes, uh-huh. Yvonne, Yvonne Ramon, uh-huh.
 23 Q. And is she the Hidalgo County elections
 24 administrator?
 25 A. Yes, uh-huh, yes.

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1 A. Through the meetings. You know, we have
 2 meetings in the community and meetings here.
 3 Q. So let me try to clarify it.
 4 A. Okay.
 5 Q. There's a flyer that the organizers and the
 6 support -- the services people use?
 7 A. Uh-huh.
 8 Q. Do you know what that flyer contains? What
 9 information that flyer contains?
 10 A. It has what to expect from the voter ID, like
 11 what -- what is it and how is it going to -- how could
 12 you get ready for it? What did you need to have.
 13 Q. Specifically in the same way that that flyer is
 14 used, are any other flyers or specific printed
 15 information used by organizers or services?
 16 A. Actually, we put together a booklet on it, too,
 17 with many pages on -- not just on that, but voter ID was
 18 one of the issues. We had a big -- a big candidates
 19 forum and we gave those out to educate the people and we
 20 asked the candidates about their -- we asked them a
 21 question on the voter ID. I don't remember the question
 22 exactly, but we did ask them about voter ID. And that
 23 was a huge event that we had here in McAllen.
 24 Q. Do you know if that packet has been produced?
 25 A. I don't remember. Oh, yes. Yes, uh-huh, it

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1 Q. And that number is for a ride to the polls?
 2 A. Well, that number is for any questions,
 3 actually, that they may have. And if anybody knows who
 4 can give rides, I would think, and any questions, it
 5 would be -- she's in charge of that.
 6 Q. So you said very few times has LUPE given
 7 rides?
 8 A. Yes, uh-huh. Yeah.
 9 Q. Do you remember the last time that it happened?
 10 A. Probably the last -- probably the last election
 11 again. Probably in March.
 12 Q. March of 2014?
 13 A. Uh-huh, yes.
 14 Q. How about voter registration, does LUPE help
 15 people register to vote?
 16 A. Yes, that's very, very important. We do that a
 17 lot. Yes, uh-huh.
 18 Q. How often?
 19 A. All the time. We have stacks of voter
 20 registration cards. So if you're not registered, we can
 21 do it for you like really quick. We do that a lot in
 22 all of the offices, inside, outside with the organizers,
 23 year-round, yeah. That's very important to us.
 24 MR. WHITLEY: And I think it's noon.
 25 MS. VAN DALEN: We can go off the record.

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1 MR. WHITLEY: So we can go off the record.
 2 (A recess was taken for lunch.)
 3 MR. WHITLEY: For the record, Ryan, will
 4 you please state your name?
 5 MR. KING: Sure. Ryan king.
 6 MR. WHITLEY: From the Department of
 7 Justice, correct?
 8 MR. KING: That's correct.
 9 Q. (By Mr. Whitley) Okay. Ms. Cox, Exhibit 2, I
 10 think, is before you?
 11 A. Yes.
 12 Q. And do you know what that document is?
 13 A. This is the lawsuit.
 14 Q. Yes. It's the complaint. It's you-all's
 15 amended complaint. Have you seen that before?
 16 Obviously you saw it earlier in the deposition?
 17 A. Right.
 18 Q. Did you assist in the preparation of that
 19 complaint?
 20 A. Well, the -- with the lawyers. You know, they
 21 asked some questions.
 22 Q. On the first page, do you see LUPE there listed
 23 as one of the plaintiffs?
 24 A. Yes, uh-huh.
 25 Q. Then if you would, follow me to paragraph 13.

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1 then to Texas.
 2 MS. VAN DALEN: It moved or expanded?
 3 A. It expanded. You're right, yes.
 4 Q. So it still exists in California?
 5 A. It existed at that time; it doesn't now. At
 6 one point it existed in California and Arizona, and then
 7 now it's just in Texas.
 8 Q. So is there a part of LUPE that still runs in
 9 California at this moment?
 10 A. No, nuh-huh.
 11 Q. When did the California version of LUPE cease
 12 operations?
 13 A. I don't recall the date exactly, but it -- but
 14 maybe around -- maybe, what, maybe around 2000 --
 15 somewhere around 2001. Between 2001 and 2004, around
 16 that time.
 17 Q. Okay.
 18 A. Well, that's what I remember.
 19 Q. And then so the next sentence in that complaint
 20 starts with "the organization has more than"?
 21 A. Yes, more than 7,000 members.
 22 Q. Is that just in Texas?
 23 A. Yes, uh-huh.
 24 Q. And then let's go to two sentences later that
 25 starts with "in response to."

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1 It should be on page 3.
 2 A. Yes.
 3 Q. Do you understand that this complaint is filed
 4 by your attorneys on your behalf in this lawsuit?
 5 A. Yes.
 6 Q. If you would, read me the second sentence of
 7 number 13, starting with "LUPE was founded."
 8 A. "LUPE was founded by Cesar Chavez to help meet
 9 the advocacy and organizing needs of low-wage workers
 10 and their families."
 11 Q. And, again, just for the record, that was
 12 founded by Cesar Chavez in what year?
 13 A. 1989 in California.
 14 Q. And then will you start with the next sentence
 15 that starts "LUPE has operated."
 16 A. "LUPE has operated an office in San Juan,
 17 Hidalgo County, Texas, for over ten years and also has
 18 offices in the cities of Alton, Las Milpas, Mercedes and
 19 Edcouch, Texas.
 20 Q. And that includes all of the LUPE offices in
 21 Texas?
 22 A. Yes, uh-huh.
 23 Q. What about -- so it started in California and
 24 then it moved to Texas; is that correct?
 25 A. Well, actually, it moved to Arizona first and

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1 A. "In response to passage of the Texas voter
 2 identification law, LUPE staff diverted significant
 3 resources to educating their members and the larger
 4 public on the new laws requirements."
 5 Q. Is that true?
 6 A. Yes, uh-huh.
 7 Q. In what way were significant resources
 8 diverted?
 9 A. In -- in how -- in the discussions we had
 10 earlier when I -- when I talked about the organizers
 11 that do the work out there, and then I talked about the
 12 social services, and I told you about like John Michael,
 13 you know, with us. So it's --
 14 Q. Is John Michael -- I'm sorry for interrupting.
 15 A. -- the involvement of the staff.
 16 Q. Is John Michael the communications director?
 17 A. Yes, he is.
 18 Q. Do you know what portion of the budget
 19 financial resources were diverted by LUPE?
 20 A. A percentage? No, I don't know.
 21 Q. Okay. The next sentence starts with "these
 22 efforts were undertaken." Will you read that one for
 23 me, please?
 24 A. "These efforts were undertaken to minimize the
 25 number of otherwise eligible voters who would be unable

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1 to vote."

2 Q. Has LUPE had any success in those efforts?
3 A. Have we had what again, please?
4 Q. Any success in those efforts?
5 A. I hope so. To -- to -- you mean for them to be
6 able to get the documents required so they can vote?
7 Q. Yes, ma'am.
8 A. I don't know how -- I hope so.
9 Q. Do you know --
10 A. Slowly it's going to get into.
11 Q. -- specifically whether or not LUPE has had any
12 success in minimizing the number of otherwise eligible
13 voters who would be unable to vote?
14 A. Let me read it again. I think -- I think that
15 we did some.
16 Q. Do you remember any specific instances?
17 A. Well, no, because you rely on that -- you know,
18 that folks actually read the flyer that you give them
19 and that can come up with the documents to do that, to
20 be able to go and get their ID. But we don't know that,
21 that that is the -- that is the case for sure. We don't
22 know. We don't have ways of tracking that.
23 Q. And we talked about the flyer before.
24 A. Right.
25 Q. Other than the flyer, was any other publication

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1 A. Uh-huh.
2 Q. The tweet that I showed you from LUPE's --
3 A. Right.
4 Q. -- Twitter feed, do you remember the date of
5 that?
6 A. I know it was in 2013.
7 Q. It was June of 2013.
8 A. Okay. Actually, yes, it was June the 26th of
9 2013.
10 Q. So since June of 2013, has LUPE issued any
11 press releases regarding voter ID?
12 A. After June 2013?
13 Q. Uh-huh, yes, ma'am.
14 A. Other press releases? I'm not sure. I'm not
15 sure. We might have, but I'm not sure. I just don't
16 see how this could be the only one, but I don't remember
17 exactly. We may have.
18 Q. Okay.
19 A. This was a very important issue, so I think
20 that we may have.
21 Q. But you can't remember for sure?
22 A. No.
23 Q. And back to Exhibit 2, if you would, the
24 complaint that we were looking at earlier.
25 A. Okay.

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1 involved in those efforts to minimize --
2 A. Yeah, remember I told you about the -- I'm
3 sorry.
4 Q. No, go ahead.
5 A. I told you about the booklet and about the form
6 and about the meetings, the community meetings, and the
7 services.
8 Q. Written material would just be the booklet and
9 a flyer?
10 A. And the -- no. And the -- and the press
11 release that we talked about, the press release.
12 Q. And I was a little unclear on the press
13 release. Do you remember when that was issued?
14 A. No, but we have a copy of that. They have a
15 copy of it. You have a copy.
16 MR. WHITLEY: And we can put this into the
17 record as well.
18 (Exhibit No. 4 was marked.)
19 Q. (By Mr. Whitley) So that's Exhibit 4. Is that
20 the press release you were referring to earlier?
21 A. Yes.
22 Q. Can you read me the date on the press release?
23 A. This one was August 30th, 2012.
24 Q. Around do you remember earlier when we were
25 discussing when voter ID was put into effect?

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1 Q. If you would, turn to page -- it should be page
2 17. And I'm looking for paragraph 90.
3 A. Okay. 17. Okay. I got it.
4 Q. Will you read the first sentence in paragraph
5 90?
6 A. "Plaintiff La Union del Pueblo Entero has
7 citizen members who lack the necessary identification to
8 vote under the requirement of SB 14 and who are unable
9 to -- and who are unable to make the financial
10 sacrifices required to obtain or correct or correct such
11 identification documents."
12 Q. What would LUPE define as a financial
13 sacrifice?
14 A. That our membership -- many of our 7,000
15 members are very, very low income people. And any --
16 any kind of this requirement would place an extra burden
17 on their family. You know, on very, very low income
18 people.
19 Q. Can you read the next sentence starting with
20 "further LUPE?"
21 A. "Further, LUPE has had to divert its limited
22 resources to provide voter education services to low
23 income Mexican Americans in the Rio Grande Valley
24 regarding the SB 14 requirements about how its members
25 must comply with the new law."

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1 Q. Is that true?

2 A. Yes, the voter -- yes, uh-huh.

3 Q. And again, just to be clear, do you know

4 specifically what the amount of resources -- financial

5 resources LUPE has had to divert for this purpose?

6 A. I don't know the amount, but I know that we --

7 we all put a lot of time into it because, again, as I

8 have stated earlier, it's a very important issue to our

9 membership, to have the right to vote.

10 Q. Are you aware that one of the forms of

11 supporting documentation to get an EIC is a birth

12 certificate?

13 A. You said that earlier. Yes, uh-huh.

14 Q. And are you aware that if somebody needs a

15 birth certificate for the purposes of getting an EIC,

16 that that person can get it for \$2 or \$3?

17 A. No. I thought earlier you said it was free.

18 That's what I had said that I didn't know it was free.

19 Q. The election identification certificate is

20 free.

21 A. Oh, okay.

22 Q. To get -- are you aware that to get a birth

23 certificate for the purposes of showing it to DPS to get

24 an EIC, which is the election certificate, the birth

25 certificate is \$2 or \$3?

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1 A. No, it's not.

2 MS. VAN DALEN: I'm going to object to the

3 question as putting facts in evidence. And let the

4 witness answer.

5 A. It's -- no. Remember earlier we also talked

6 about immigration services? And the birth certificates

7 are much more expensive than that. I think they run

8 around \$26 or \$28.

9 Q. And --

10 A. That's the information -- you know, that's the

11 work that we do here. That's how much the birth

12 certificates are when you -- when you send one off to

13 get to the state. That's the amount that the money

14 order -- more or less that's what they ask for.

15 Q. I'll represent to you here that if somebody

16 needs a birth certificate for the purposes of getting an

17 election identification certificate, that birth

18 certificate is \$2 or \$3 maximum.

19 MS. VAN DALEN: And I'm going to object

20 and dispute that representation. You can answer the

21 question. Actually, I don't think there was a question.

22 Go ahead.

23 MR. WHITLEY: There wasn't.

24 Q. (By Mr. Whitley) Did LUPE urge the Department

25 of Justice to sue the State of Texas over SB 14?

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1 A. No.

2 MS. VAN DALEN: I'm going to object to the

3 question insofar as it asks for communications protected

4 by the attorney/client privilege.

5 Q. (By Mr. Whitley) You can answer.

6 THE WITNESS: I can answer?

7 MS. VAN DALEN: Yes.

8 A. No, no.

9 Q. Did LUPE draft any amendments to SB 14 while it

10 was being considered?

11 A. No, nuh-huh.

12 Q. Did LUPE write any articles or opinion pieces

13 about SB 14 when it was being considered?

14 A. Not that I recall.

15 Q. Does LUPE possess any studies on the effect of

16 SB 14 on minority voters?

17 A. Do we have -- do we possess studies?

18 Q. Uh-huh.

19 A. Studies? Except what we know from our work.

20 You know, our experiences, our history of our

21 communities here and the discrimination upon communities

22 and, you know, the low income that they are, the high

23 unemployment. Based on that, we know that it would

24 be -- that it is -- it's not a study, an official study,

25 but that's -- that's what we use, right, to know that it

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1 would have a negative impact.

2 Q. So any data that would have been received from

3 the community has not been compiled into a study?

4 A. No.

5 Q. How about reports?

6 A. That we have done?

7 Q. Yes, ma'am.

8 A. LUPE has done? No, we have not done them.

9 Q. Is LUPE aware of any reports on the effect of

10 SB 14 on minority voters?

11 A. I think that I've seen somewhere that -- I

12 remember seeing some numbers that -- on -- I don't know

13 if it was an opinion or an article in the newspaper of

14 how there had been a study done and that it was -- it

15 was having -- they were large numbers. They talked

16 about thousands of people that were going to be denied

17 the right to vote because of it.

18 Q. Has LUPE done any reports as an organization on

19 the effect of SB 14 on minority voters?

20 A. LUPE, we haven't, except our communication with

21 the communities.

22 Q. Has LUPE estimated the effect of SB 14 on

23 minority voters?

24 MS. VAN DALEN: I'm going to object to the

25 question being vague. You can try to answer.

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1 A. No, I don't know how many, but as hard as we
2 work to get them registered, to get them the right, you
3 know, so they can vote, one would be too many.
4 Q. And did LUPE as an organization undertake any
5 efforts to prevent SB 14 from being passed?
6 A. No. I think we were pretty busy with other
7 bills. Had we, I think we would have very much tried to
8 stop it.
9 Q. What other bills were you busy with?
10 A. The anti-immigrant legislation that was
11 happening at that time.
12 Q. Did LUPE attempt to slow down or delay
13 consideration of SB 14?
14 A. Slow down? Once it was a law?
15 Q. No. Before it was a law, while it was still a
16 bill?
17 A. No, nuh-huh. Again, it wasn't very public.
18 You know, that I -- I don't remember it being very
19 public, and we didn't. But had we known, we would have
20 done something, tried anyway to stop it.
21 Q. Did LUPE receive any communications, written
22 communications, from its members regarding SB 14?
23 A. Written, no, just verbal.
24 Q. Do you recall the previous voter ID bill before
25 SB 14? It was in 2009.

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1 Q. Does LUPE contend that SB 14 was enacted with a
2 discriminatory purpose?
3 A. We do. I do.
4 Q. What is that based on?
5 A. Again, it's based on our -- the history of
6 Mexican Americans in South Texas, of minorities in South
7 Texas. It's based on, for example, my dad had to pay
8 for a poll tax when that made it difficult and harder
9 for him to vote. I think that, you know, the
10 difficulties of the situation in South Texas with the
11 members that we -- that we represent, I think that it
12 does -- it does deny them -- it does deny them the right
13 to vote. And because they're all Mexican American, I
14 think that it is discriminatory.
15 And, again, there was no basis, in LUPE's
16 opinion, our opinion, for the change in the law. There
17 was no basis for obstacles to be placed on people to
18 vote. And, you know, just the many obstacles that this
19 law places on them, it discriminates their right to
20 vote.
21 Q. Is it LUPE's position that SB 14 is a poll tax?
22 A. It's very -- it's -- it's an obstacle like the
23 poll tax was. And it's -- and it's something that like
24 the poll tax was done to keep low income people to
25 make -- well, actually, to make it harder for them to

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1 A. The one on the redistricting?
2 Q. No. It was a voter ID bill, and it was Senate
3 Bill 362.
4 A. I don't remember.
5 Q. Okay. Do you recall any previous versions of
6 voter ID related bills?
7 A. I know that there were some, but I couldn't --
8 I don't remember how they were different than this one.
9 Q. Do you remember whether or not LUPE opposed any
10 of those bills while they were being considered?
11 A. I don't remember that we did, but I do know
12 that -- I don't remember exactly whether we did or
13 didn't, but we would have. It would be -- it would be
14 the thing that we would do. We would oppose them
15 because we don't see any reason to have them, so we
16 would oppose them.
17 Q. You would normally?
18 A. We would -- yes, we would normally. And so
19 based on that, I think that I would say that we
20 probably -- we probably did.
21 Q. But do you remember specifically whether or not
22 you did?
23 A. Not specifically. But based on our history of
24 taking care of the privilege to vote, we probably would
25 have.

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1 vote because you shouldn't have to pay to vote.
2 Q. Does LUPE contend that the legislature acted
3 outside normal procedures in enacting SB 14?
4 A. I don't know what normal procedures you mean,
5 what -- I don't know what that means.
6 Q. Whatever you would determine. Whatever your
7 opinion of normal procedures would be in a legislature?
8 MS. VAN DALEN: And I'll object that the
9 question is vague. You can answer if you can.
10 A. I don't know what normal -- no, I don't know
11 what that is.
12 Q. Okay. Does LUPE contend that the legislature
13 acted outside its authority in making rule changes?
14 A. Do they have the authority to do that? I don't
15 think that anybody should have the authority to take out
16 your right to vote.
17 Q. Does LUPE contend that SB 14 specifically
18 prevents people from voting?
19 A. Yes.
20 Q. In what way?
21 A. We do.
22 Q. In what ways?
23 A. In that it's made it more difficult to vote in
24 that -- in that for years and years and years we've been
25 able to vote with our voter card and now why -- why add

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1 to that? In our opinion, there was no reason to make it
 2 more difficult. If anything, the state should
 3 concentrate on making it easier for people to vote,
 4 right, on doing more to get people to the polls instead
 5 of -- instead of what they're doing and making it more
 6 difficult.
 7 Q. Does LUPE contend that any legislator who voted
 8 for SB 14 did so with discriminatory intent?
 9 A. I think that by -- by voting on the bill in --
 10 well, by voting in favor of the bill, I think that
 11 that's what they did.
 12 Q. Does LUPE contend that the legislature intended
 13 to harm any minority group by enacting SB 14?
 14 A. That's what they did. That is what -- that is
 15 what has happened. That is what they did.
 16 Q. In what way?
 17 A. By making it more difficult for people to
 18 exercise, you know, their right to vote, by placing
 19 obstacles on a person's right to vote for no reason at
 20 all. There was no -- no -- there was nothing that was
 21 happening that they should -- it was -- it was -- the
 22 voting and the voter card, everything was working fine.
 23 There was no reason to add anything to that.
 24 Q. Does LUPE believe that it was not given the
 25 opportunity to voice its opposition to SB 14 in front of

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1 and I have my card, they decide. I don't know why the
 2 state should be -- should be -- well, if you -- no, I
 3 don't think they should be involved.
 4 Q. Are you aware that the local poll workers are
 5 acting on state law when they administer elections?
 6 A. I didn't know it was -- I assumed it was state
 7 law.
 8 Q. Does LUPE believe that Texas should make sure
 9 that people do not vote or attempt to vote in the name
 10 of another person?
 11 A. Can you repeat that?
 12 Q. Sure. Does LUPE believe that Texas should make
 13 sure that people do not vote or attempt to vote in the
 14 name of another person?
 15 A. I don't think that -- I don't think that that
 16 is -- that that is -- that that is right, that people
 17 vote under the name of another person. I don't -- I
 18 don't think that that's what's happening. Does -- well,
 19 I can't ask you questions.
 20 THE WITNESS: I was going to ask him
 21 something.
 22 Q. (By Mr. Whitley) Assuming it does, do you
 23 think that Texas should make sure that it does not
 24 happen?
 25 MS. VAN DALEN: I'm going to object to the

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1 the legislature?
 2 A. It was not -- they didn't give us the
 3 opportunity? Again, because -- again, I say that it was
 4 kept sort of secret and there was -- it wasn't too
 5 public. We didn't get a lot of notice of what was going
 6 on in the legislature. So I don't know.
 7 Maybe they were dealing with it in a -- in
 8 secrecy so that we didn't find out until it was already
 9 passed and then we had to deal with it. But if we had
 10 been given the opportunity, we would have been there to
 11 oppose it.
 12 Q. Does LUPE support the idea that only registered
 13 voters should be allowed to vote?
 14 A. Yes, that's -- that's the way it's done.
 15 Q. Does LUPE believe that Texas should make sure
 16 that people attempting to vote are registered voters?
 17 A. Do we support the idea that registered
 18 voters -- can you repeat that, please?
 19 Q. Absolutely. Does LUPE believe that Texas
 20 should make sure that people attempting to vote are
 21 registered voters?
 22 A. Well, that's -- I don't know about the state
 23 because that's why you have people at the polls, the
 24 judges and everybody else. They know -- they know the
 25 rules and the laws. And so if you go -- if I go vote

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1 question as calling for speculation and posing a
 2 hypothetical.
 3 Q. (By Mr. Whitley) You can answer.
 4 A. You know, it doesn't happen. You know, how can
 5 you vote in the name of another person? You have your
 6 voter -- your voter -- your voter card.
 7 Q. Does LUPE acknowledge that voter fraud exists?
 8 A. Does LUPE acknowledge -- LUPE acknowledges that
 9 it doesn't exist.
 10 Q. Does LUPE acknowledge that voter fraud exists?
 11 A. No.
 12 Q. So it's the position of LUPE that voter fraud
 13 never takes place?
 14 MS. VAN DALEN: The question has been
 15 asked and answered. You can answer again.
 16 A. I'm saying that in my years of working in this
 17 community and, you know, the work that we're involved in
 18 with civic engagement and stuff, I don't think that that
 19 is something that happens to the point of where the
 20 state has to impose these obstacles upon its community.
 21 Q. So it's LUPE's position that voter fraud
 22 doesn't exist in Texas or anywhere else?
 23 A. I can't say. I can't say that that it doesn't
 24 exist anywhere else. I'm saying in our community in
 25 South Texas, you know, that I know --

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1 Q. So you're saying -- I'm sorry.
 2 A. What I'm saying is I don't think it exists to
 3 where it creates an issue for the state to take -- to
 4 develop laws that they may be thinking that they are
 5 righting -- making right something that is wrong, but
 6 they are -- they're making something that is right
 7 wrong.
 8 Q. Does voter fraud exist or not?
 9 A. Somewhere in the world probably.
 10 MS. VAN DALEN: I'm going to object to the
 11 question as overly broad, vague, ambiguous.
 12 Q. (By Mr. Whitley) You can answer. Go ahead.
 13 A. Somewhere probably in the world.
 14 Q. Do you think that SB 14 prevents someone from
 15 casting the vote of someone else?
 16 A. Again, these questions seem to be based on
 17 something that I can't relate to because that's not
 18 something that in my experience happens, and so I just
 19 don't think that they are questions that I'd want to
 20 address or answer because that's not what I believe
 21 happens. And it's the same thing over and over again
 22 that I keep telling you, is that I don't see those as
 23 the reasons why you have SB 14.
 24 Q. Has any member or -- strike that.
 25 Has any member of LUPE ever expressed support

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1 there's other groups throughout the State of Texas that
 2 feel the same way, especially minorities, like African
 3 Americans and Mexican Americans. I'm sure there's some
 4 in the State of Texas that would be just opposed as we
 5 are here.
 6 (Exhibit No. 5 was marked.)
 7 Q. (By Mr. Whitley) You've been handed what's
 8 been marked as Exhibit 5.
 9 A. Yes, uh-huh.
 10 Q. And can you describe to me what this is?
 11 A. This looks like -- what is it? I don't know.
 12 It's like a note.
 13 Q. Can you read me the web address at the bottom,
 14 just the first part?
 15 A. It says -- it's a Twitter account. Yeah.
 16 Q. This was posted to LUPE's Twitter account.
 17 A. Okay.
 18 Q. Can you read me what the tweet says?
 19 A. It says, "88 percent of likely voters support a
 20 pathway to citizenship for DREAMers. Time is" --
 21 Q. You can finish. I'm sorry. Go ahead.
 22 A. "Time is now" and "ready for reform."
 23 Q. And then if you turn the page, what is on the
 24 next page?
 25 A. On the next page is 88 -- the same thing, "88

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1 for SB 14?
 2 A. No.
 3 MS. VAN DALEN: That you -- I mean,
 4 object, it calls for speculation.
 5 Q. (By Mr. Whitley) Has any member of LUPE ever
 6 expressed support for any other voter ID law?
 7 A. No.
 8 MS. VAN DALEN: I'm going to object, it
 9 calls for speculation.
 10 Q. (By Mr. Whitley) You can answer.
 11 A. No, we do not -- I don't think that that
 12 would -- that that would happen. Why -- why would a
 13 group that has been discriminated against and that has
 14 struggled so long to get that right, why would they --
 15 why would they support SB 14?
 16 Q. Does LUPE believe that voter ID requirements
 17 were not popular among Texans when SB 14 was being
 18 considered?
 19 MS. VAN DALEN: Object, calls for
 20 speculation.
 21 Q. (By Mr. Whitley) You can answer. I can repeat
 22 it.
 23 A. I don't know about the rest of Texas. I know
 24 that it was not popular with the community that we
 25 represent and the low income community. And so I'm sure

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1 percent of voters support a pathway to citizenship for
 2 DREAMers."
 3 Q. And underneath that figure, there's a source.
 4 A. Yes.
 5 Q. What is that source?
 6 A. Basswood, Basswood Research.
 7 Q. Do you remember approving this tweet before it
 8 went out?
 9 A. For the Dreamers, yes.
 10 Q. Are you aware that according to a poll
 11 conducted by the Texas Tribune and University of Texas
 12 in February of 2011 --
 13 A. 2011.
 14 Q. -- while SB 14 was being considered, that 75
 15 percent of registered voters agreed with the proposition
 16 that voters should have to present a government-issued
 17 photo ID before they can be allowed to vote?
 18 A. No.
 19 MS. VAN DALEN: I'm going to object to
 20 this question. You know, it's an exhibit that's been
 21 presented. I don't know what you're referring to. But
 22 the witness can answer if she knows.
 23 A. No. I was going to say, I didn't know that --
 24 I didn't know about that, that they had polled them.
 25 But I also know that very rarely are low income Mexican

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1 Americans are polled. So if they were polled, that
 2 would be a different thing. So probably they just got
 3 people in Austin or somewhere like that where it's
 4 mainly, you know, upper class kind of folks maybe.
 5 (Exhibit No. 6 was marked.)
 6 MS. VAN DALEN: Is this a document that's
 7 already been produced in this case?
 8 MR. WHITLEY: We can go off the record.
 9 (Off the record.)
 10 Q. (By Mr. Whitley) You've been handed what's
 11 been marked as Exhibit 6.
 12 A. Yes, uh-huh.
 13 Q. And what does the top of the page say there on
 14 the first page?
 15 A. The bars?
 16 Q. Uh-huh.
 17 A. It says "75 percent, 17 percent and 8 percent."
 18 Q. And then can you see what tab is highlighted
 19 there at the top?
 20 A. Voter ID prefaces.
 21 Q. Uh-huh.
 22 A. Yes.
 23 Q. And can you read me at the very top there's a
 24 line that starts with Texas Politics.
 25 A. "Texas Politics voter identification, February

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1 Q. And so would you agree that this poll shows
 2 that 75 percent of Texans agree that registered voters
 3 should be required to present a government-issued photo
 4 ID before they can be allowed to vote?
 5 MS. VAN DALEN: And I'm going to object to
 6 the question. I have no idea if this poll actually
 7 reflects what Texans believe or not. I don't know who
 8 was polled by whom or how many people, etcetera. But if
 9 the witness wants to answer that question, we can put it
 10 on the record.
 11 A. What was the question? Do I agree?
 12 Q. I'll repeat it. Would you agree that this poll
 13 shows that 75 percent of Texans agree?
 14 A. Yes, that's what it --
 15 Q. With the statement that's printed above the bar
 16 graph?
 17 A. That's what it says. That's what it says.
 18 That's what it says there. But, again, I don't know who
 19 was polled. Maybe it was just Austin people or --
 20 MS. VAN DALEN: It's not even clear on the
 21 face of the document that it's Texans that are being
 22 polled.
 23 A. So we don't know. I wouldn't agree with it.
 24 Q. Personally you wouldn't agree?
 25 A. For our organization, on behalf of our

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1 2011."
 2 Q. Then if you would, read me the first line
 3 underneath the tabs that starts "do you agree."
 4 A. "Do you agree or disagree that registered
 5 voters should be required to present a government-issued
 6 photo ID before they can be allowed to vote."
 7 MS. VAN DALEN: I'd like to -- sorry, go
 8 ahead.
 9 A. February 2011.
 10 MS. VAN DALEN: I'm going to put an
 11 objection on the record that this -- whether people
 12 support voter ID or not has no relevance to the case and
 13 that this exhibit hasn't been presented in advance of
 14 this deposition as a potential exhibit. But we can
 15 continue with the questioning.
 16 MR. WHITLEY: Okay. As you can see at the
 17 top, I printed it out yesterday, so I apologize that it
 18 wasn't presented in advance of the deposition.
 19 Q. (By Mr. Whitley) And you previously read the
 20 percentage above that first bar?
 21 A. 75, uh-huh.
 22 Q. 75 percent, correct?
 23 A. Yes.
 24 Q. And under that bar is what word?
 25 A. "Agree."

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1 organization.
 2 Q. If you would, turn to the second page. Do you
 3 see the tab that's highlighted there?
 4 A. The breakdown?
 5 Q. Uh-huh.
 6 A. Where it says breakdown, yes.
 7 Q. Breakdown by --
 8 A. Party ID.
 9 Q. Can you read me the question right after that?
 10 A. "Do you agree," that one?
 11 Q. Uh-huh.
 12 A. "Or disagree that registered voters should be
 13 required to present a government-issued photo ID before
 14 they can even be allowed to vote?"
 15 Q. And on that first group of bars on the left,
 16 the three colors --
 17 A. Right.
 18 Q. -- represent Democrats, Republicans and
 19 Independents?
 20 A. Yes.
 21 Q. Can you read me which percentages apply to
 22 which group?
 23 A. 58 percent apply to Democrats, 92 to
 24 Republicans, and 70 percent to Independents.
 25 Q. Okay. If you would, turn to the next page.

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1 A. But on that one, you know, it says required to
 2 present a government-issued photo ID. So if this is the
 3 case, then if I were asked this question, I would say I
 4 agree, but I would be thinking that I could present just
 5 my driver's license to vote.
 6 Q. Which is what you can do today.
 7 A. No, you can't just vote with your driver's
 8 license. The way I understand it is that I could go
 9 without even my voter card and go to vote with my
 10 license.
 11 Q. You can do that today.
 12 A. No, I can't. You have to have your voter ID.
 13 MS. VAN DALEN: No, under --
 14 A. No, not ID. I don't mean your voter ID, I
 15 mean, your voter card, your certificate.
 16 MS. VAN DALEN: Under SB 14 you need to
 17 have one of the forms of photo ID. You don't need to
 18 have your voter registration card. It used to be that
 19 you could just vote with your voter registration card.
 20 THE WITNESS: Right.
 21 A. But when you go vote, they ask you for your
 22 driver's license. That's what I'm saying. That's what
 23 I understand.
 24 Q. Let's turn to the third page. Can you see what
 25 tab is highlighted there?

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1 A. Yes.
 2 Q. And on -- please turn to the fourth page.
 3 A. Okay. Got it.
 4 Q. Can you read me at the very, very top what it
 5 says, Texas Politics?
 6 A. "Voter ID law support, October 2012."
 7 Q. And then what tab is highlighted there?
 8 A. "By race."
 9 Q. And will you read me that question?
 10 A. "Do you agree or disagree with the idea that
 11 registered voters should be required to present a
 12 government-issued photo ID at the polls before they can
 13 be allowed to vote?"
 14 Q. And do you see that group of bars on the left?
 15 A. Yes.
 16 Q. And do you see that the three colors apply to
 17 White, African American and Hispanic?
 18 A. Yes.
 19 Q. And can you read to me the percentages that
 20 apply to those respective groups?
 21 A. 71 percent applies to the White and 33 percent
 22 applies to the African American and 75 percent applies
 23 to Hispanics.
 24 MS. VAN DALEN: And I'm going to object
 25 again to this exhibit as first not having been presented

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1 A. The third one?
 2 Q. Yes, ma'am.
 3 A. Breakdown by race.
 4 Q. And will you read me that question?
 5 A. "Do you agree or disagree that registered
 6 voters should be required to present a government-issued
 7 photo ID before they can be allowed to vote?"
 8 Q. And then that group of bars on the left --
 9 A. Uh-huh.
 10 Q. -- that represent the agrees --
 11 A. Right.
 12 Q. -- do you see that there are three colors that
 13 represent White, African American and Latino?
 14 A. Right.
 15 Q. Responded to the survey?
 16 A. Right.
 17 Q. Can you read me the percentages that apply to
 18 each of those groups?
 19 A. 80 percent to White, 63 percent to African
 20 American, and 68 percent to Latino.
 21 Q. Okay.
 22 A. But, again, it's who they asked.
 23 (Exhibit No. 7 was marked.)
 24 Q. (By Mr. Whitley) I've handed you what's been
 25 marked as Exhibit 7.

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1 prior to this deposition. And secondly, as being
 2 unclear what actually this data means, who it was
 3 obtained from, the methodology, etcetera.
 4 MR. WHITLEY: I'll represent on the record
 5 in response to that objection --
 6 THE WITNESS: And I would also like to say
 7 that the 22 percent that disagree, that's where we would
 8 be at.
 9 MR. WHITLEY: Thank you. In response to
 10 that objection, I want to state for the record that this
 11 poll is available at the URL at the bottom of each page
 12 of this poll, as is the methodology.
 13 THE WITNESS: Okay.
 14 Q. (By Mr. Whitley) So looking at Exhibits -- at
 15 the third page of 6 and the fourth page of 7.
 16 A. The what page in 6?
 17 Q. The third page of 6?
 18 A. Okay.
 19 Q. And the fourth page of 7.
 20 A. Okay. One second. 7. What was the last page?
 21 Q. By race. Breakdown by race on 6 and by race on
 22 7.
 23 A. Yes, I have it.
 24 Q. Can you read to me the percentage in February
 25 2011 that this --

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1 A. Yes.
 2 Q. -- that this poll shows --
 3 A. Uh-huh.
 4 Q. -- of Latinos that agreed that registered
 5 voters should be required to present a government-issued
 6 photo ID before they can be allowed to vote?
 7 A. 68 percent.
 8 Q. And then if you go to the October 2012, which
 9 is number 7 --
 10 A. Yes, uh-huh.
 11 Q. -- can you read to me that percentage as it
 12 applies to Hispanics?
 13 A. Of the Hispanics, it is 75 percent.
 14 Q. And would you agree that these two polls show
 15 that that percentage increased?
 16 A. Based on these two polls, which we don't know
 17 how they were conducted, that's what it shows.
 18 Q. Okay. Thank you.
 19 A. Do you know where this was done? Was it done
 20 in the Valley, people that were polled?
 21 Q. The respondents?
 22 A. Uh-huh.
 23 MS. VAN DALEN: He has no idea. And you
 24 don't get to ask him questions, right?
 25 MR. WHITLEY: I'm not saying I don't have

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1 A. Oh, yes, yes, where you can vote, but then you
 2 have to like go to the courthouse and prove that you
 3 were eligible to vote?
 4 Q. Right.
 5 A. Yes, I've heard of that. I didn't know that
 6 that's how you called it. Yeah.
 7 Q. And has LUPE, either on its own or through
 8 counsel, submitted public records requests of various
 9 counties --
 10 A. Uh-huh.
 11 Q. -- seeking information regarding provisional
 12 ballots cast during the most recent election cycle?
 13 A. We asked. We asked what the process would be,
 14 but we didn't put it in writing or through the
 15 counsel -- or through counsel. It was on our own that
 16 we wanted to know how that would be.
 17 Q. And who did you ask?
 18 A. We had a training with Ms. Yvonne Ramon.
 19 Q. The county election administrator in Hidalgo
 20 County?
 21 A. Yes, uh-huh, because now -- before you could be
 22 deputized to register. Before you didn't have to. It
 23 got stricter now also in that sense that now you have to
 24 be deputized in order to register, and so she gave us a
 25 training on that, and it came out, yes.

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1 any idea, but I do agree with your second statement.
 2 THE WITNESS: Oh, okay.
 3 Q. (By Mr. Whitley) You stated earlier that LUPE
 4 believes that SB 14 denies or abridges the right to vote
 5 of its members, correct?
 6 A. Correct.
 7 Q. And you stated that LUPE didn't have any
 8 studies or data that were conducted by LUPE or anybody
 9 else?
 10 MS. VAN DALEN: I can --
 11 A. I said by LUPE.
 12 Q. In written form that would confirm that?
 13 A. Not by LUPE.
 14 Q. Are you familiar with the provisional ballot
 15 process established by SB 14?
 16 A. No.
 17 Q. Has LUPE, either on its own or through counsel,
 18 submitted public records requests to various counties
 19 seeking information regarding provisional ballots cast
 20 during the most recent election cycle?
 21 A. Provisional ballot is like for people that are
 22 abroad or that they can vote? I don't understand
 23 provisional ballot.
 24 Q. Provisional ballot is on election day at the
 25 polling place. If you --

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1 MS. VAN DALEN: And for the record, to
 2 clarify, as you know, an open records request has been
 3 made to counties for provisional ballots and have
 4 actually been produced to the state by TRLA on behalf of
 5 its clients in this litigation.
 6 MR. WHITLEY: So is it on behalf of LUPE
 7 as well?
 8 MS. VAN DALEN: Yes.
 9 MR. WHITLEY: Fair enough.
 10 Q. (By Mr. Whitley) Were those requests to the
 11 counties based on any studies that were conducted by
 12 LUPE?
 13 MS. VAN DALEN: She's already testified
 14 she didn't even know about the requests.
 15 Q. (By Mr. Whitley) Does LUPE contend that a
 16 significant portion of its members lack any of the
 17 acceptable forms of ID under SB 14?
 18 A. We contend that they do lack them.
 19 Q. Do you know what portion?
 20 A. A percentage, you're saying?
 21 Q. Sure.
 22 A. No.
 23 Q. Do you know how many specifically?
 24 A. Out of 7,000, no, I don't know.
 25 Q. Can you identify one member of LUPE that does

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1 not have any of the acceptable forms of ID under SB 14?
 2 A. I know -- I know of them, but I don't think I
 3 can give you that information.
 4 Q. But you can identify one member?
 5 A. Yes, uh-huh.
 6 Q. Do you know how many of your members do not
 7 have a driver's license?
 8 A. That don't have a driver's license? I don't
 9 know how many, but it's -- it's -- I don't know how I
 10 could say how many, but there are many that don't have a
 11 driver's license.
 12 Q. Do you know how many of your members do not
 13 have a state-issued photo ID?
 14 A. I don't know how many. I know that a lot of
 15 our members don't have a voter ID.
 16 Q. I'm just talking about a state-issued photo ID.
 17 A. Right. Yeah. No, we don't.
 18 Q. Which could be a driver's license, a concealed
 19 handgun license.
 20 A. Yes. No.
 21 Q. A personal identification card?
 22 A. I don't know how many don't.
 23 Q. Do you know how many of your members do not
 24 have a passport?
 25 A. I don't know how many. I know that they -- a

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1 of anybody at all of your members who have attempted to
 2 get an EIC?
 3 A. I don't know. I don't know how many, but I do
 4 remember a conversation from the organizers about some
 5 of the people in their meetings that had tried, but they
 6 were -- I really don't know what the issue was, why they
 7 couldn't, whether they lacked how many pieces of
 8 documents they needed or if they weren't accepted or
 9 what had happened.
 10 Q. So you're not sure what the issue was?
 11 A. I know that they couldn't get it, but I don't
 12 know like specifically based on if it was that they
 13 didn't have -- they didn't have the -- all of the
 14 documents that are required or the ones that they had
 15 were outdated or they -- you know, I don't know what the
 16 issue was.
 17 Q. Did anyone from LUPE follow-up with that
 18 person?
 19 A. We tried to, and she -- and she hasn't
 20 responded, but we'll keep trying.
 21 Q. Is LUPE able to identify any Texas registered
 22 voter who, as of the filing of your complaint, which is
 23 November 5th --
 24 A. Of 2013?
 25 Q. -- 2013 had been unable to vote on account of

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1 lot of them don't, but I don't know the number.
 2 Q. Do you know how many of your members do not
 3 have a military ID card with a photo?
 4 A. I do not know.
 5 Q. Do you know how many of your members do not
 6 have a citizenship certificate?
 7 A. I can't give you a number of the 7,000.
 8 Q. Can you identify one member that does not have
 9 any of the documents necessary to get an EIC? When I
 10 say EIC, I mean the election identification certificate.
 11 A. Right. She's not a member now, but I do know
 12 of somebody that doesn't have anything.
 13 Q. When did she cease to become a member?
 14 A. Oh, maybe -- it's been a while. It's been a
 15 number of years.
 16 Q. How many years?
 17 A. Oh, maybe -- let me think. Maybe five or six.
 18 Q. Do you know how many of your members have
 19 attempted to get an EIC?
 20 A. No, I don't.
 21 Q. Do you know of anybody who has attempted to get
 22 an EIC?
 23 A. That's the same question.
 24 Q. Well, the first one was do you know how many,
 25 and you said you didn't know how many. But do you know

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1 his or her inability to obtain an acceptable form of ID
 2 under SB 14?
 3 A. They have not -- that they have not been able
 4 to vote?
 5 Q. On account of inability to obtain one of the
 6 acceptable forms of ID under SB 14?
 7 A. We've heard -- we've heard that they were not
 8 going to be able to vote. Like when we were knocking on
 9 doors to get them out to vote, some were saying that
 10 they didn't have any documentation, so they didn't --
 11 they probably were not going to go vote. They didn't
 12 have the documentation that was required to get the
 13 photo ID, and so they were not going to go vote.
 14 Q. Are you able to identify somebody specifically?
 15 A. If we look at the precincts that we worked this
 16 last election, maybe the organizers could.
 17 Q. Can you?
 18 A. No, myself, I can't, but I could ask.
 19 Q. Was that person or people who are identified,
 20 were they members of LUPE?
 21 A. One -- some were; others were not.
 22 Q. So that was in November?
 23 A. No. In March.
 24 Q. Okay. So --
 25 A. I don't remember about November. I'm not sure

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1 exactly the date. I don't remember if it was March, the
 2 last one. I don't remember if it was March of this year
 3 or if it was -- well -- or November of last year. I
 4 don't remember.
 5 Q. Is LUPE able to identify any member who is
 6 currently at present or has been unable to vote because
 7 of her inability to obtain acceptable form of ID under
 8 SB 14? So that fast forwards it to the present.
 9 A. Right now you're saying? In the last election?
 10 Q. So the example you have is from the last
 11 election?
 12 A. Uh-huh.
 13 Q. And that is the March 2014 primary?
 14 A. Uh-huh. That went to vote and they were not
 15 allowed to vote? Or what was it? Can you read it
 16 again?
 17 Q. Sure. Is LUPE able to identify any LUPE member
 18 who at present is unable to vote because of his or her
 19 inability to obtain an acceptable form of ID under SB
 20 14?
 21 A. Probably -- I'm trying to -- I'm trying to
 22 remember whether the ones I remember have renewed their
 23 membership or not. I don't think they're LUPE members
 24 right now.
 25 Q. Is LUPE able to identify any Texas registered

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1 Q. Do you remember where those stories came from?
 2 A. From the newspaper.
 3 Q. Do you remember the location of the registered
 4 voter that was having problems that was identified in
 5 the news story?
 6 A. I think it was -- I don't know why -- East
 7 Texas or West Texas.
 8 Q. Texas is a big place.
 9 A. Yeah, but I'm thinking because --
 10 Q. It was either far east or far west?
 11 A. Right. And I don't remember where.
 12 Q. Okay. Does LUPE contend that SB 14 makes it
 13 impossible for anyone to vote?
 14 MS. VAN DALEN: I'm going to object to the
 15 question as vague. You can answer.
 16 A. Can you read it again?
 17 Q. Sure. Does LUPE contend that SB 14 makes it
 18 impossible for anyone to vote?
 19 A. I don't know. Impossible is like -- I don't
 20 know totally impossible, but it does make it -- if you
 21 place obstacles on people that want to vote, then it's
 22 our belief that they're more likely to get discouraged
 23 and not vote. But it just -- you know, I just believe
 24 that it makes it -- it makes it difficult. And if
 25 obstacles are placed in there and you can't vote, I

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1 voter who is at present unable to vote because of his or
 2 her inability to obtain acceptable forms of ID under SB
 3 14, an acceptable form?
 4 A. Right. Yes.
 5 Q. And is that registered voter a member of LUPE?
 6 A. No. I mean, they haven't renewed.
 7 Q. Is LUPE able to identify a specific instance in
 8 which a LUPE member attempted to obtain an acceptable
 9 form of ID under SB 14 but was unable to?
 10 A. I don't know personally.
 11 Q. Is LUPE able to identify a specific instance in
 12 which a Texas registered voter attempted to obtain an
 13 acceptable form of ID under SB 14 but was unable to?
 14 A. I've read of some cases where they weren't, but
 15 they're not LUPE members.
 16 Q. What cases did you read?
 17 A. In other parts of the State of Texas there
 18 were -- I think it was an African American and also a
 19 Mexican American that stated that they were not able
 20 to -- that they had not -- their issue was more, I think
 21 it was like transportation or some other issue that they
 22 couldn't get because they were living in a very remote
 23 area or far away area from DPS and they couldn't get
 24 there to get their form of ID. Do you remember that
 25 one? It was in -- it was in the --

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1 guess it does make it impossible, right? Yes.
 2 Q. Compared to previous elections, do you know if
 3 more or less LUPE members voted in any election since SB
 4 14 was implemented?
 5 A. No, I don't know.
 6 Q. Do you know if any LUPE members chose not to
 7 vote in an election because of SB 14?
 8 MS. VAN DALEN: I'm going to object to the
 9 question as ambiguous. You can answer.
 10 Q. (By Mr. Whitley) You can answer.
 11 A. I don't know.
 12 Q. Is LUPE able to identify a LUPE member who has
 13 suffered harm at any point because of SB 14?
 14 A. There are many. There are many within LUPE
 15 that were hurt by SB 14.
 16 Q. Are you able to identify a specific member?
 17 A. That were harmed by this bill?
 18 Q. Uh-huh.
 19 A. Yes.
 20 Q. Has LUPE seen its donations or sponsorships
 21 increase as a result of its work related to SB 14?
 22 A. Our funds increased because of it?
 23 Q. Sponsorships or donations?
 24 A. No.
 25 Q. How about membership?

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1 A. It's because of our -- no, I don't attribute it
 2 just to SB 14. I couldn't tell really if it could be
 3 because of the advertising by -- you know, the educating
 4 that went on when the organizers were talking about it.
 5 Maybe more people did join, but I don't have like data
 6 to show that that happened.
 7 Q. So has LUPE seen its donations or sponsorships
 8 increase in general over the last year?
 9 A. I don't know how we could do that -- how we
 10 can -- how I could tell that.
 11 Q. Do you get -- is more money coming in from
 12 sponsorships or donations as compared to last year?
 13 A. Money donations? Not because of SB 14.
 14 Q. In general?
 15 A. Oh, in general? I think it's more than last
 16 year because we -- we started new programs and now we
 17 increased -- not increased programs, but we added new
 18 programs.
 19 MS. VAN DALEN: Can we go off the record
 20 for a second?
 21 (A recess was taken.)
 22 MR. WHITLEY: Back on the record.
 23 Q. (By Mr. Whitley) Does LUPE contend that any of
 24 its SB 14 related activities fall outside the scope of
 25 its organizational mission or goals?

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1 apologize, I only have one copy, so I'll walk around
 2 there with you.
 3 (Exhibit No. 8 was marked.)
 4 Q. (By Mr. Whitley) I'm handing you what's been
 5 marked as Exhibit 8. And can you read what that says?
 6 MS. VAN DALEN: I just want to look
 7 through it first.
 8 MR. WHITLEY: Okay.
 9 THE WITNESS: It's so little, right? It's
 10 tiny. Do you have a copy of this?
 11 MR. WHITLEY: I only have one copy. I'm
 12 sorry.
 13 THE WITNESS: Okay. I have one.
 14 MS. VAN DALEN: That's okay. I just want
 15 to look through it quickly because I haven't seen it.
 16 Q. (By Mr. Whitley) Okay. Can you read to me
 17 what that says?
 18 A. Form 990.
 19 Q. And we are on page 2 of the exhibit. It's not
 20 marked, but we flipped to it.
 21 A. Yes, yes.
 22 Q. And can you read me what's listed here on top?
 23 A. Return -- this one?
 24 Q. Uh-huh.
 25 A. "Return of organization exempt form" -- no,

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1 A. Outside of it?
 2 Q. Uh-huh.
 3 A. We didn't expect it to be -- to be spending
 4 time on something like this, so it wasn't like we put it
 5 in a specific line item in -- like in the budget, right.
 6 It was something that came out that has an impact on the
 7 community that we felt that we had to -- we had to deal
 8 with it. We had to work on it.
 9 Q. So SB 14 is not a line item in the budget?
 10 A. No. It's part of the expenses from the budget,
 11 but not a line item.
 12 Q. And does LUPE contend that it is unable to
 13 fulfill its mission because of SB 14?
 14 A. Oh, no, our mission includes -- it's broad and
 15 it's not specifically -- our mission is not just on
 16 voter ID, on voter registration or -- it's more than
 17 just on voter -- on voting, right, but it's part of it.
 18 LUPE's mission to help -- to have a fair and just
 19 society includes that, but there's others.
 20 Q. So because of SB 14, is LUPE -- even though SB
 21 14 is in place, is LUPE still able to fulfill its
 22 mission?
 23 A. Not completely because if it continues this
 24 way, then it's not creating a more fair, just society.
 25 MR. WHITLEY: I'll mark this. And I

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1 "exempt from income tax."
 2 Q. And the year?
 3 A. 2011.
 4 Q. And then really tiny in box C in that dark box,
 5 can you read me the information in there?
 6 A. The name?
 7 Q. Yes, ma'am.
 8 A. La Union del Pueblo Entero.
 9 Q. And then the rest of the information in there?
 10 A. Doing business as -- all of this?
 11 Q. Uh-huh.
 12 A. 29700 Woodford-Tehachapi Road, Keene,
 13 California.
 14 Q. Okay. We are going to turn to page 8. And can
 15 you read to me what part that is right there?
 16 A. Compensation, part 7.
 17 Q. And then can you read the names here in 1
 18 through 7 for me?
 19 A. Read the names?
 20 Q. Yes, ma'am.
 21 A. Fernando Mancillas, Nora Linares-Moeller, Pablo
 22 F. Chavez, Linda Rockstad, Juanita Valdez-Cox, Tanis
 23 Ybarra, Arturo Rodriguez, Arturo S. Rodriguez.
 24 Q. And then for each of those people, will you
 25 read how many hours per week are allotted to them on

154

1 this chart?

2 A. 100 per week.

3 Q. I think that's 1.

4 A. Oh, 1. Okay. 1, 1, 1, 1, 40, 1, 1.

5 Q. Okay. And the 40 applies to?

6 A. To me.

7 Q. Okay. And then in column D, there's one value

8 in there?

9 A. Right.

10 Q. And that applies to who?

11 A. To me.

12 Q. And what's that number?

13 A. 47,308.

14 Q. And then in column E?

15 A. 180,357.

16 Q. To whom?

17 A. To the Cesar Chavez Foundation.

18 Q. That's to the Cesar Chavez Foundation?

19 A. Right, uh-huh.

20 Q. Do you know what that number represents?

21 A. I think this was a -- I think it was a -- a

22 grant. The Cesar Chavez Foundation, it grants out. And

23 if you apply for a grant to the Cesar Chavez Foundation,

24 a percentage of the foundation is given out to

25 non-profits, and I think that that may be it, or a loan.

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1 A. He lives in California, but he's part of the

2 board, of the LUPE board, yes.

3 Q. Okay. Is he part of that board that accepts a

4 new community member every year?

5 A. Yes, exactly, uh-huh.

6 Q. And who decided to pay him that amount of

7 money?

8 A. No. Like I said, this is -- I think that this

9 is a -- I can -- I think this is a grant that we --

10 well, I don't know. I think this is money that we --

11 that we either got, a grant or a loan that we have to

12 pay back. I'm not sure.

13 Q. Okay. Let's turn to page --

14 A. But we can find out.

15 Q. -- 29 in the document, which is not numbered.

16 A. Oh, look what it says. "Reportable

17 compensation from related organizations." This is their

18 salary from their organizations.

19 Q. So we're still on page 8. And you're reading

20 from column E?

21 A. Right.

22 Q. And read it again for the record.

23 A. Well, it says, "reportable compensation from

24 related organizations" because we're all related.

25 Q. So what would the related organization be?

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1 Q. And so this is LUPE's 990 filing --

2 A. Yes, it is.

3 Q. -- that you read on the second page of the

4 document?

5 A. Yes, it is.

6 Q. And that's an outgoing expenditure to you for

7 your salary?

8 A. Right.

9 Q. And that's an outgoing expenditure to Paul

10 Chavez?

11 A. Right.

12 Q. For \$180,357?

13 A. Right. For the foundation, uh-huh.

14 Q. And he works how many hours a week?

15 A. Well, this is just a board meeting. He doesn't

16 work for us.

17 Q. So he attends a board meeting --

18 A. Right.

19 Q. -- once a year for an hour?

20 A. It's a yearly meeting. No, it usually -- I

21 don't know. That one usually lasts -- we usually start

22 them at about 1:00 -- sometimes like at 9:00 and it goes

23 till noon or sometimes like at 1:30. Maybe three or

24 four hours.

25 Q. And is he on the board here in Texas?

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1 A. Well, the Cesar Chavez farm worker movement has

2 many entities under it. LUPE is an entity, the Cesar

3 Chavez Foundation is an entity, The United Farm Workers

4 is an entity, the Robert F. Kennedy Medical Plan. Well,

5 there's different entities. We're all like sister

6 organizations related because of the same founder.

7 Q. So would the Cesar Chavez Foundation be like

8 the parent? Or is there --

9 A. No, it's one -- it's one entity under the farm

10 worker movement.

11 Q. Okay. And so that amount of money, the 180,357

12 paid to Paul Chavez came from a related organization?

13 A. Right, uh-huh.

14 Q. Not LUPE?

15 A. No. We don't pay the board members.

16 Q. So one of the related organizations could be

17 one of the ones you listed?

18 A. Yes, uh-huh.

19 MS. VAN DALEN: And I'm just going to

20 state for the record an objection to the use of this

21 document with this witness because I'm not -- I don't

22 know what role, if any, she had in the preparation of

23 this document. We didn't know this was going to be used

24 today. She's testifying to the best of her ability, but

25 it may be that she's completely mistaken. She's not the

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1 accountant, she didn't prepare it, I don't think.
 2 THE WITNESS: No, this is from our auditor
 3 and our bookkeepers.
 4 Q. (By Mr. Whitley) So let's turn to page 29.
 5 A. Okay.
 6 Q. And then can you read the top here?
 7 A. Schedule R Form 990, related organizations and
 8 unrelated partnerships.
 9 Q. Okay. So what are the related organizations?
 10 A. Oh, those are the ones -- see, this is the one
 11 I just mentioned, the Robert F. Kennedy Medical Plan.
 12 Q. So you're looking in column A?
 13 A. Uh-huh. And the Cesar Chavez Foundation,
 14 that's here. And the Stonybrook United Farm Workers,
 15 those are the ones that I mentioned that they are --
 16 Q. What is Stonybrook?
 17 A. Stonybrook Corporation is they have the -- what
 18 do they call it? The Cesar Chavez -- I can't think of
 19 it. It's like -- like the history of the union. The
 20 events that they hold under Cesar Chavez's name. It's
 21 like an events center that's run by the farm worker
 22 movement.
 23 Q. Stonybrook is?
 24 A. Yes, Stonybrook is.
 25 Q. So is Stonybrook one of those sister

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1 answer them. Have I been courteous to you?
 2 A. Those are the questions?
 3 Q. That's my first question.
 4 A. Yes, you have. Sorry.
 5 Q. Have I treated you in what you would consider
 6 to be a professional manner?
 7 A. Yes.
 8 Q. Has there been anything about my conduct or
 9 demeanor that has caused you to answer in any other way
 10 but the truth?
 11 A. No.
 12 Q. Did you have an opportunity to answer all
 13 questions fully?
 14 A. The ones that I was able to.
 15 Q. And we've been going since 9:30. But are there
 16 any answers you want to retract, add to, change, amend,
 17 or modify in any way? And I can give you as much time
 18 as you want to think about that.
 19 A. To add to it?
 20 Q. Change your answers in any way?
 21 A. Oh, change them? No.
 22 Q. You can add to them, you can subtract from
 23 them, you can change them.
 24 A. No. I just -- I think when I was answering,
 25 I -- I want to be able to convey very honestly -- you

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1 organizations that would be --
 2 A. It's an entity.
 3 Q. -- that exists alongside LUPE and the Cesar
 4 Chavez Foundation?
 5 A. And these other ones, uh-huh. This Juan
 6 De La Cruz, that's our pension plan.
 7 Q. Okay. Thank you very much.
 8 A. Uh-huh, sure. What does that have to do with
 9 the voter ID?
 10 Q. I was just trying to come up with what your
 11 numbers were because you didn't know what the numbers
 12 were last time.
 13 A. What numbers? Our budget?
 14 Q. You don't need to ask me anything.
 15 MS. VAN DALEN: That's okay.
 16 Q. (By Mr. Whitley) I'm going to ask you --
 17 A. As executive director, you're sort of used to
 18 asking the questions, but not here, right?
 19 MS. VAN DALEN: Imagine if one of us had
 20 to be subjected to this.
 21 Q. (By Mr. Whitley) I'm going to ask you some
 22 questions now that might seem silly. And we're closing
 23 up.
 24 A. Aye, gracias a Dios.
 25 Q. I want to make sure that you have a chance to

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1 know, and maybe it's not for you to believe or for
 2 anybody in this room to believe, but I do want to convey
 3 the -- how critical this situation is for us and for our
 4 membership and for low income people. You know, how
 5 serious we take the right to vote, how hard we work to
 6 get the right to vote. And how offensive it is for the
 7 state to come in and impose these obstacles on our
 8 membership and our community on minorities.
 9 And through the questioning, I didn't feel like
 10 I was -- I was -- because the questions have to be -- I
 11 have to just respond to your questions, I wasn't given
 12 the opportunity to say these things of how -- how
 13 serious we take this and how honestly I reported to you
 14 the community that I know and the history of this
 15 community and how it has suffered because of many unfair
 16 and unjust laws. And that we consider this one one of
 17 those. And that to the best of my ability, I want -- I
 18 want to convey that.
 19 I want that to be -- to be very clear. We take
 20 the membership dues from the lowest in the community
 21 that pay to us to do a good job of representing them,
 22 and I think that that's -- you know, that's what we try
 23 to do. I just want to make sure that that was -- that
 24 that was conveyed in my responses to you.
 25 Q. I appreciate you taking the time to do so.

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1 A. Yes. Thank you.
 2 Q. Is there anything else you want to clarify
 3 before we finish up?
 4 A. No, just -- I think in the end I was taken by
 5 surprise when you -- about the 990 because when you
 6 questioned me about those, I got a feeling that maybe
 7 you were trying to say -- insinuate something that
 8 wasn't there when you were questioning me about the
 9 foundations. And you were -- and you directly asked me
 10 whether we paid them and I felt a little bit offended by
 11 that because that's not the kind of organization we are.
 12 I mean, we don't -- we don't -- I don't know if
 13 you know of board where you get paid to belong, but not
 14 the farm workers boards that I belong to or that they
 15 belong to. So there's -- there's a very honest and
 16 clear answer about this because we have a very -- a very
 17 good auditor who's in charge.
 18 Q. Thank you.
 19 A. Don't give me anymore opportunities because --
 20 I'm sorry.
 21 Q. I don't have any other questions.
 22 A. No. Thank you so much.
 23 MR. WHITLEY: I pass the witness.
 24 MS. VAN DALEN: I don't have any questions
 25 and I will reserve our questions for trial.

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1 CHANGES AND SIGNATURE
 2 WITNESS NAME: JUANITA VALDEZ-COX
 3 DATE OF DEPOSITION: JUNE 25, 2014
 4 PAGE LINE CHANGE REASON
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 _____

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1 COURT REPORTER: Before I conclude the
 2 deposition, are there any stipulations that you-all want
 3 to put on the record regarding the original deposition
 4 or any exhibits?
 5 MR. WHITLEY: No.
 6 COURT REPORTER: All right. Then this
 7 concludes the deposition at 2:09 p.m.
 8
 9 * * * * *

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1 I, JUANITA VALDEZ-COX, have read the foregoing
 2 deposition and hereby affix my signature that same is
 3 true and correct, except as noted above.
 4
 5 _____
 6 JUANITA VALDEZ-COX
 7
 8 THE STATE OF TEXAS:
 9 COUNTY OF HIDALGO :
 10
 11 Before me, _____, on this
 12 day personally appeared JUANITA VALDEZ-COX, known to me
 13 (or proved to me under oath or through
 14 _____) (description of identity card or
 15 other document) to be the person whose name is
 16 subscribed to the foregoing instrument and acknowledged
 17 to me that they executed the same for the purposes and
 18 consideration therein expressed.
 19 Given under my hand and seal of office this
 20 _____ day of _____, 2014.
 21
 22
 23 _____
 24 NOTARY PUBLIC IN AND FOR
 25 THE STATE OF TEXAS
 COMMISSION EXPIRES: _____

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 CORPUS CHRISTI DIVISION
4
5 MARC VEASEY, JANE HAMILTON,)
6 SERGIO DELEON, FLOYD J.)
7 CARRIER, ANNA BURNS, MICHAEL)
8 MONTEZ, PENNY POPE, OSCAR)
9 ORTIZ, KOBAY OZIAS, JOHN)
10 MELLOR-CRUMLEY, PEGGY)
11 HERMAN, EVELYN BRICKNER,)
12 GORDON BENJAMIN, KEN GANDY,)
13 LEAGUE OF UNITED LATIN) CIVIL ACTION NO.
14 AMERICAN CITIZENS (LULAC),) 2:13-CV-193 (NGR)
15 AND DALLAS COUNTY, TEXAS) [Lead case]
16 Plaintiffs)
17 VS.)
18 RICK PERRY, Governor of)
19 Texas; and JOHN STEEN, Texas)
20 Secretary of State,)
21 Defendants)
22 UNITED STATES OF AMERICA,)
23 Plaintiffs)
24 TEXAS LEAGUE OF YOUNG VOTERS)
25 EDUCATION FUND, IMANI CLARK,)
AND MICHELLE BESSIAKE,)
Plaintiff-Intervenor)
TEXAS ASSOCIATION OF)
HISPANIC COUNTY JUDGES AND)
COUNTY COMMISSIONERS; and)
HIDALGO COUNTY,)
Plaintiff-Intervenor) CIVIL ACTION NO.
VS.) 2:13-CV-263 (NGR)
[Consolidated case]
STATE OF TEXAS, JOHN STEEN,)
in his official capacity as)
Texas Secretary of State;)
and STEVE McCRAW, in his)
official capacity as)
Director of the Texas)
Department of Public Safety,)
Defendants.)
-----)

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1 That the witness, JUANITA VALDEZ-COX, was duly sworn
2 by the officer and that the transcript of the oral
3 deposition is a true record of the testimony given by
4 the witness;
5 That the deposition transcript was submitted on
6 _____, 2014 to MS. MARINDA VAN DALEN for the
7 witness to examine, sign and return to Integrity Legal
8 Support Solutions by _____, 2014;
9 That the amount of time used by each party at the
10 deposition is as follows:
11 MR. G. DAVID WHITLEY - 03:30:38
12 That pursuant to information given to the deposition
13 officer at the time said testimony was taken, the
14 following includes counsel for all parties of record:
15
16 MS. MARINDA VAN DALEN and MS. PRISCILLA NORIEGA,
17 Attorneys for the Plaintiff La Union Del Pueblo
18 Entero, Inc.
19 MS. ANGELA MILLER and MR. RYAN KING, Attorneys for
20 the Plaintiff United State of America
21 MR. G. DAVID WHITLEY, Attorney for the Defendants
22 State of Texas, Rick Perry, John Steen, and Steve
23 McCraw
24 That \$_____ is the deposition officer's charges
25 to the Defendants for preparing the original deposition
transcript and any copies of exhibits;
I further certify that I am neither counsel for,
related to, nor employed by any of the parties or

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1 -----)
2 TEXAS STATE CONFERENCE OF)
3 NAACP BRANCHES; and the)
4 MEXICAN AMERICAN LEGISLATIVE)
5 CAUCUS OF THE TEXAS HOUSE OF)
6 REPRESENTATIVES,)
7 Plaintiffs) CIVIL ACTION NO.
8) 2:13-CV-291 (NGR)
9 VS.) [Consolidated case]
10 JOHN STEEN, in his official)
11 capacity as Secretary of)
12 State of Texas; and STEVE)
13 McCRAW, in his official)
14 capacity as Director of the)
15 Texas Department of Public)
16 Safety,)
17 Defendants)
18 BELINDA ORTIZ, LENARD)
19 TAYLOR, EULALIO MENDEZ JR.,)
20 LIONEL ESTRADA; ESTELA)
21 GARCIA ESPINOSA, LYDIA LARA,)
22 MARGARITO MARTINEZ LARA,)
23 MAXIMINA MARTINEZ LARA, AND)
24 LA UNION DEL PUEBLO ENTERO,) CIVIL ACTION NO.
25 INC.,) 2:13-CV-348 (NGR)
Plaintiffs) [Consolidated case]
VS.)
STATE OF TEXAS, JOHN STEEN,)
in his official capacity as)
Texas Secretary of State;)
and STEVE McCRAW, in his)
official capacity as)
Director of the Texas)
Department of Public Safety,)
Defendants.)
-----)
REPORTER'S CERTIFICATION
DEPOSITION OF JUANITA VALDEZ-COX
TAKEN ON JUNE 25, 2014
I, SYLVIA KERR, Certified Shorthand Reporter in and
for the State of Texas, hereby certify to the following:

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1 attorneys in the action in which this proceeding was
2 taken, and further that I am not financially or
3 otherwise interested in the outcome of the action.
4 Certified to by me this 27th of June, 2014.
5
6
7
8 SYLVIA KERR, Texas CSR No. 4776
9 Expiration Date: 12/31/14
10 Integrity Legal Support Solutions
11 Firm Registration No. 528
12 3100 West Slaughter Lane, Suite A-101
13 Austin, Texas 78748
14 (512) 320-8690
15 (512) 320-8692 Fax
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